



PUBLIC DISCLOSURE

November 3, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Old National Bank
Charter Number: 8846

1 Main Street
Evansville, IN 47708

Office of the Comptroller of the Currency

Regional and Midsize Financial Institutions
400 7th Street SW
Washington D.C., 20219

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**.

The following table indicates the performance level of **Old National Bank (ONB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Old National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based primarily on Outstanding performance in the Chicago Multistate Metropolitan Statistical Area (MMSA), Davenport MMSA, Evansville MMSA, and the state of Indiana. The bank is a leader in making Community Development (CD) loans, which had a significantly positive impact on the overall Lending Test and was a catalyst to elevating the overall Lending Test rating. The bank makes extensive use of innovative and flexible loan products to serve the needs of its communities.
- The Investment Test rating is based primarily on Outstanding performance in the Chicago MMSA, Davenport MMSA, Evansville MMSA, Louisville MMSA, South Bend MMSA, the state of Indiana, the state of Michigan, the state of Minnesota, the state of Tennessee, and the state of Wisconsin. The bank had an excellent level of CD investments, which was responsive to community needs throughout its rating areas.
- The Service Test rating is based primarily on High Satisfactory performance in the Chicago MMSA and the state of Illinois. The bank exhibited Outstanding performance in the Davenport MMSA, Evansville MMSA, South Bend MMSA, the state of Indiana, the state of Minnesota, and the state of Wisconsin. The bank's delivery systems were accessible to geographies and individuals of different income levels. The bank had good levels of CD services which demonstrated responsiveness to community needs, leadership, and complexity.

Lending in Assessment Area

A high percentage of the bank's loans were in its assessment area (AA).

The bank originated and purchased 84.4 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	23,500	83.1%	4,791	16.9%	28,291	\$7,110,842	71.2%	\$2,876,925	28.8%	\$9,987,767
Small Business	11,469	87.8%	1,601	12.2%	13,070	\$3,098,291	86.6%	\$479,699	13.4%	\$3,577,990
Small Farm	1,247	79.3%	326	20.7%	1,573	\$212,379	78.8%	\$57,252	21.2%	\$269,631
Total	36,216	84.4%	6,718	15.6%	42,934	\$10,421,512	75.3%	\$3,413,876	24.7%	\$13,835,388

Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Conclusions are factored into the overall analysis of geographical distribution of lending by income level of the geography.

Innovative or Flexible Lending Products

The following are a summary of innovative and flexible loan products that are offered throughout the bank's footprint. Refer to the *Innovative and Flexible Lending Products* section in each rating area for details on additional innovative and flexible loan products offered through a state, county, or municipality that are not available outside of a designated geography.

The bank made extensive use of flexible home mortgage loans. During the evaluation period, the bank originated 2,425 flexible home mortgage loans totaling \$467.6 million. Flexible mortgage loans were offered in all rating areas. Federal programs include the Federal Housing Administration (FHA), United States Department of Agriculture (USDA), and the Veterans Administration (VA). Refer to the *Product Innovation and Flexibility* section in the Lending Test section of each MMSA or state for additional information.

The bank made extensive use of small business loans to promote economic development via the Small Business Administration (SBA) loan program. In total, the bank originated 551 loans through various SBA programs totaling \$577.4 million. The bank utilized the SBA express, SBA 7A, and SBA 504 programs. These loans were used for purchasing real estate, acquisition, construction, equipment purchase, and working capital. Capital for small businesses was an identified community need in various AAs throughout the bank's footprint.

Federal Housing Administration (FHA) Mortgage Loans

FHA loans are regulated and insured by the FHA. They allow for down-payments as low as 3.5 percent, and lower credit scores than conventional loans. During the evaluation period, the bank originated 272 FHA loans totaling \$64.6 million. Breakdown of FHA loans is as follows:

- 6 loans totaling \$1.2 million in Iowa
- 38 loans totaling \$7.7 million in Illinois
- 91 loans totaling \$19.5 million in Indiana
- 39 loans totaling \$9.3 million in Kentucky
- 33 loans totaling \$7.3 million in Michigan

- 15 loans totaling \$4.8 million in Minnesota
- 28 loans totaling \$9.0 million Tennessee
- 22 loans totaling \$5.8 million in Wisconsin

Home Manager Mortgage

The Home Manager Mortgage program is designed to help first-time homebuyers. Borrowers can obtain up to 97 percent loan-to-value. The product has no private mortgage insurance (PMI). The interest rate is fixed with the seller paying closing costs and prepaid items. Home Manager participants are asked to complete a Department of Housing and Urban Development certified Home Buyer Education Program. Over the course of the evaluation period, the bank originated 875 Home Manager mortgages totaling \$152.0 million in the bank's AA. Breakdown of the Home Manager mortgages is as follows:

- 16 loans totaling \$1.8 million in Iowa
- 136 loans totaling \$25.1 million in Illinois
- 441 loans totaling \$70.1 million in Indiana
- 89 loans totaling \$14.8 million in Kentucky
- 73 loans totaling \$13.6 million in Michigan
- 61 loans totaling \$15.6 million in Minnesota
- 11 loans totaling \$2.7 million in Tennessee
- 48 loans totaling \$8.4 million in Wisconsin

Home Possible

Home Possible is a Freddie Mac mortgage product. The product is focused towards LMI borrowers. There is a low-down payment with loan-to-values as high as 97 percent, and even 105 percent combined loan-to-values with affordable seconds, a subordinate lien for down payment assistance, closing costs, or renovations. Borrower's annual income cannot exceed 100 percent of the area median income to be eligible for the product. Over the course of the evaluation period, the bank originated 96 loans totaling \$19.4 million. Breakdown of the Home Possible mortgages is as follows:

- 33 loans totaling \$6.1 million in Illinois
- 14 loans totaling \$2.1 million in Indiana
- 4 loans totaling \$494,425 in Kentucky
- 14 loans totaling \$2.9 million in Michigan
- 11 loans totaling \$3.1 million in Minnesota
- 14 loans totaling \$3.6 million in Tennessee
- 6 loans totaling \$1.2 million in Wisconsin

Home Ready

Home Ready is a flexible mortgage solution from Fannie Mae that reduces the barrier to homeownership for low-income borrowers. The product is for first-time or repeat borrowers with low income, limited cash for down payment, and limited supplemental boarder or rental income. Program downpayments are as little as three percent. Over the course of the evaluation period, the bank originated 675 loans totaling \$128.4 million. Breakdown of the Home Ready mortgages are as follows:

- 2 loans totaling \$262,200 in Iowa

- 113 loans totaling \$21.9 million in Illinois
- 164 loans totaling \$25.9 million in Indiana
- 38 loans totaling \$6.3 million in Kentucky
- 217 loans totaling \$43.9 million in Michigan
- 52 loans totaling \$12.2 million in Minnesota
- 2 loans totaling \$569,900 in Tennessee
- 87 loans totaling \$17.3 million in Wisconsin

USDA

The USDA's Rural Housing Service offers loans, grants, and loan guarantees for single and multi-family housing and essential community facilities in rural areas. Rural Housing Service also provides technical assistance loans and grants in partnership with non-profit organizations, Indian tribes, and state and federal government agencies. During the evaluation period, the bank originated 42 loans totaling \$6.6 million. Breakdown of the USDA mortgages are as follows:

- 3 loans totaling \$353,433 in Illinois
- 18 loans totaling \$3.2 million in Indiana
- 5 loans totaling \$989,932 in Kentucky
- 3 loans totaling \$466,564 in Michigan
- 11 loans totaling \$862,624 in Minnesota
- 2 loans totaling \$761,614 in Tennessee

VA

VA loans are home loans guaranteed by the US Department of Veterans Affairs for service members, veterans, and eligible family members. The program includes no down payments, no PMI, and limited closing costs. During the evaluation period, the bank originated 98 loans totaling \$29.6 million. Breakdown of the VA mortgages are as follows:

- 12 loans totaling \$3.4 million in Illinois
- 28 loans totaling \$7.0 million in Indiana
- 10 loans totaling \$2.4 million in Kentucky
- 16 loans totaling \$5.2 million in Michigan
- 11 loans totaling \$3.9 million in Minnesota
- 14 loans totaling \$5.2 million in Tennessee
- 7 loans totaling \$2.5 million in Wisconsin

Wisconsin State Housing

The Wisconsin Housing and Economic Development Authority provides down payment and closing costs. The program is targeted to LMI borrowers. During the evaluation period, the bank originated 52 loans totaling \$10.5 million. One loan was in Indiana for \$280,000 however, the remainder were in Wisconsin.

SBA Loan programs

SBA loans are partially guaranteed by the U.S. Small Business Administration. SBA loans provide access to capital, favorable terms such as lower down payments and longer paybacks.

- 106 loans totaling \$128.0 million in the Chicago MMSA.
- 3 loans totaling \$1.9 million in the Davenport MMSA.
- 6 loans totaling \$5.6 million in the Louisville MMSA.
- 10 loans totaling \$7.5 million in the Evansville MMSA.
- 4 loans totaling \$2.1 million in the South Bend MMSA.
- 2 loans totaling \$3.6 million in the state of Illinois.
- 77 loans totaling \$65.9 million in the state of Indiana.
- 27 loans for \$15.0 million in the state of Kentucky.
- 70 loans totaling \$73.2 million in the state of Michigan.
- 117 loans totaling \$125.5 million in the state of Minnesota.
- 4 loans totaling \$5.6 million in the state of Tennessee.
- 95 loans totaling \$86.8 million in the state of Wisconsin

Description of Institution

Old National Bank, N.A. (ONB or bank) is headquartered in Evansville Indiana. ONB is wholly owned by Old National Bancorp, a one bank holding company headquartered in Evansville, Indiana.

ONB operates 281 branch offices throughout the Midwest in the states of Illinois (IL), Indiana (IN), Iowa (IO), Kentucky (KY), Michigan (MI), Minnesota (MN), Tennessee (TN), and Wisconsin (WI). The bank has non-retail offices in Arizona (AZ), Kansas (KS), Missouri (MO), North Carolina (NC), and Ohio (OH). The bank offers a range of deposit and lending products including wealth management and investment, foreign currency, and treasury management services. Lending products include commercial loans, commercial real estate loans, agricultural loans, and letters of credit and lease financing. ONB also offers a variety of loans to individuals including residential real estate loans, home equity lines of credit, and consumer loans.

As of December 31, 2024, ONB had total assets of \$53.2 billion and tier 1 capital of \$4.7 billion. Net loans and leases were \$35.9 billion. The loan portfolio consisted of 28.4 percent non-farm non-residential loans, 24.0 percent one-to-four family residential loans, 23.3 percent commercial and industrial loans, 11.4 percent multifamily loans, 4.1 percent individual loans, and 1.2 percent in other loans. Total deposits were \$41.1 billion.

ONB opened five branches and closed five branches during the review period. The bank continues to be active with acquisitions, completing a merger of equals with \$22 billion Chicago based, First Midwest Bank in 2022. Additionally, the bank acquired CapStar Bank, a \$3 billion state chartered bank headquartered in Nashville, TN, in April 2024. The bank also reached an agreement to purchase Bremer bank, a \$17 billion national bank headquartered in St. Paul, MN, in November 2024. The Bremer acquisition increased total assets to over \$70 billion by year-end 2025, expanded the bank's footprint into the North Dakota market, and further expanded their presence in Minnesota and Wisconsin. The Bremer acquisition was not part of this evaluation.

The bank's prior CRA evaluation was dated November 7, 2022, and was rated as "Satisfactory".

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is January 1, 2022, through December 31, 2024. We used this evaluation period to conduct analysis, and form conclusions for the entirety of the evaluation, with a few exceptions.

The Office of Management and Budget (OMB) made changes to some MSA boundaries effective on January 1, 2024. One change was the removal of Henderson County, KY from the Evansville MMSA.

As a result of that change, the Evansville MMSA was eliminated as a rating area for Old National Bank in 2024. Henderson County, KY was included in the Kentucky Non-MSA assessment area for 2024, and the Evansville MSA was included within the state of Indiana for 2024. Additionally, we evaluated the Danville, IL MSA as its own rating area from January 1, 2022, through December 31, 2023. Due to OMB changes, Vermillion County was reclassified and was no longer part of the Danville MSA.

Vermillion County was included in the Illinois Non-MSA as of January 1, 2024, through December 31, 2024. The bank exited Racine County as an AA on January 1, 2024, thus Racine County was removed from the Milwaukee CSA for conclusions and analysis. Additionally, the bank merged with CapStar Bank on April 1, 2024, thus the TN rating area was created and analyzed from April 1, 2024, through December 31, 2024.

For the Home Mortgage Disclosure Act (HMDA) analysis and conclusions related to lending activity, geographical distribution of loans, and borrower distribution of loans, examiners consolidated home purchase, home refinance, home improvement, and multifamily lending. We concluded on all HMDA lending, small business lending, and small farm lending that met the definition of a primary product. To be a primary product there must have been at least 20 loan originations for a specific loan product, within an AA, in an evaluation period. Refer to the *Scope of the Evaluation* section in each rating area for product weightings. The bank did not include any affiliate loans, investments, or services.

Selection of Areas for Full-Scope Review

In each state where the bank had a branch one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the *Scope* section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, *Scope of Examination*, for a list of full- and limited-scope AAs.

Lending Test

Loan Products Evaluated

The OCC evaluated home mortgage, small loans to businesses, and small farm loans in each AA where the bank made at least 20 loans per evaluation period.

The analysis included both the number and dollar volume of lending. The analysis of lending, except for CD loans, emphasized the number of loans rather than the dollar volume because it is a better indicator of the number of individuals or businesses served. In AAs where examiners identified differences in performance between loan products, examiners weighted the conclusions of the products

based on the loan mix by number of loans specific to the AA over the evaluation period. Weighting of loan products in determining the bank's performance is described within the narrative comments in the scope of the evaluation in each rating area.

Split Lending Evaluations

During the evaluation period, Metropolitan Statistical Area (MSA) boundary changes introduced in July 2023, became effective on January 1, 2024, by the United States Office of Management and Budget (OMB) and resulted in the need for additional analysis for some AAs under the Lending Test. Both the geographic and borrower income distribution criteria for those AAs affected by the OMB changes received separate analyses based on 2022 through 2023 data and 2024 data, and the data are presented separately in the tables. When arriving at overall conclusions, examiners generally placed more weight on the bank's lending performance during the 2022 through 2023 period, as it generally represented a larger amount of the total period's performance. Narrative sections of the evaluation include discussion of 2022 through 2023 performance in comparison to the 2024 performance. Appendix D includes data from both 2022-2023 and 2024.

Lending Activity

For all full-scope rating areas, the bank's lending activity was evaluated by measuring the volume of the bank's lending relative to its size and resources within its respective full-scope AA. Examiners compared the market share percentage and market share ranking for deposits to market share percentage and market share ranking for HMDA, small business loans, and small farm loans (as applicable) in the bank's full-scope AAs. The bank's deposit market share ranking was divided by the total number of depository institutions and its loan market share ranking was divided by the total amount of lenders. This approach takes into consideration the difference between the number of insured depository institutions and the number of home mortgage, small business, and small farm, as applicable, lenders in the AA. These comparisons allowed examiners to evaluate the bank's capacity to lend compared to its actual lending.

Loan Distribution Analysis

Loan distribution analysis compared home mortgage loans, small loans to businesses, and small farm loans to demographic and aggregate lending data under the applicable Lending Test components. Demographic data is used to determine the reasonableness of a bank's distribution of loans among borrowers of different incomes and across geographies of different income levels. Aggregate data illustrates how the bank's lending performs relative to other lenders in the AA. Lending performance conclusions in multiple analysis periods for the same loan product are aggregated to conclude on the bank's lending performance for the entire evaluation period.

Geographic and Borrower Distribution

Equal weighting was given to the geographic and borrower distribution components of the Lending Test. For the analysis of the bank's geographic distribution of loans, the bank's performance between low- and moderate-income (LMI) geographies was weighted equally, unless otherwise noted. In both geographical and borrower distribution analysis the proportion of bank loans is compared to a demographic and aggregate comparator (Refer to appendix D for specific demographic comparators). For the home mortgage borrower distribution analysis, we conducted an affordability analysis to assess the impact that housing costs have on the ability for LMI people to qualify for a home mortgage loan

using the AAs median housing value. Examiners considered the impact of home affordability for LMI borrowers when comparing the borrower distribution of home mortgage loans to the demographics, thus more weight was placed on performance as compared to the aggregate when it was determined that LMI borrowers would be challenged to qualify for a loan based on median home values and median family income. When there were differences in performance between loan products in a specific AA, examiners determined the overall geographic or borrower distribution conclusions by weighting the products based on the loan mix by number of loans originated throughout the evaluation period.

Community Development Loans

Analysis considered the number and dollar volume of CD loans with more positive consideration provided to those loans that were particularly innovative, complex, or responsive to the needs of the AA. To provide perspective on the relative level of CD lending, the bank's tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of allocated deposits.

Investment Test

When evaluating performance in the Investment Test, examiners assessed the bank's performance in the current and prior period. Prior period investments must be made prior to the evaluation period and remain outstanding throughout the entire evaluation period. Prior period investment volume uses the book value of the investments at the end of the evaluation period. Current period investment uses the amount of the investments at the time the investment is made. When conducting analysis under the Investment Test, we use quantitative and qualitative assessments of performance. The quantitative assessments compare the CD investments and grants in each AA as compared to the AAs allocated tier 1 capital. The qualitative assessment opines on the CD investments' innovation, complexity, responsiveness, and demonstrated leadership qualities. The quantitative aspects of the analysis carry more weight than the qualitative aspects. All donations and grants must be made in the current period to count and are consolidated with the CD investments in table 4 of the *Investment Test* section.

Service Test

The review of services during the evaluation period included analyzing the bank's branch network and deposit-taking ATMs for the availability and effectiveness of delivering retail banking services. The most weight was placed on the geographic distribution of bank branches and the bank's record of opening and closing branches, particularly in LMI geographies. The analysis of the distribution of the bank's retail branches was based on branch locations as of December 31, 2024. The retail branch network analysis compared the percentage of branches in each income category to the percentage of the population in each income category, in a respective AA. Branch geographical income category classifications and the percentage of the population in each income category was of the 2020 U.S. Census.

Examiners also evaluated the bank's record of opening and closing branches and services provided at branches. Where the bank opened or closed branches within an AA, the overall impact of the changes was evaluated. If no branches were opened or closed in an AA, examiners did not include that performance element in the analysis. The focus of this analysis is placed on openings and closing in LMI geographies. Additionally, examiners focused on differences in branch hours and services in LMI geographies compared to those in middle- and upper-income (MUI) geographies.

The bank's record of providing CD services was evaluated in AAs that received full-scope reviews. The

primary consideration was the extent and responsiveness of the bank's CD services in meeting community needs. Examiners gave the most consideration to CD services that addressed critical needs and were most impactful to the AA. To determine conclusions, examiners weighed the responsiveness of the activities, the total number of hours volunteered, the expertise of the employees volunteering, and the number of persons served against the bank's capacity to provide those services.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

Examiners placed the most weight on performance in the Chicago MMSA, Evansville MMSA, state of Indiana, and state of Minnesota. We placed the most weight on these rating areas due to the fact they had the largest share of bank wide deposits, loans, and retail bank branches.

The MMSA and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the combination of conclusions in those AAs. Refer to the "Scope" section under each MMSA and State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank's) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Rating

Chicago MMSA

CRA rating for the Chicago MMSA¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographical distribution of loans in its geographies.
- The bank exhibited good distribution of loans among individuals of different income levels and business and farms of different sizes.
- The institution was a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test.
- The bank made extensive use of innovative and flexible loan products. Innovative and flexible loan products had a positive impact on the Lending Test rating.
- The institution exhibited excellent responsiveness to credit and community development needs.
- Service delivery systems were accessible geographies and individuals of different income. The bank was a leader in providing CD services.

Description of Institution's Operations in Chicago MMSA

ONB's Chicago-Naperville-Elgin IL-IN CSA (Chicago MMSA) is comprised of 11 whole counties: Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake (IL), Lake (IN), McHenry, and Will. As of the 2020 U.S. Census, the Chicago MMSA contained 2,237 census tracts, of which 12.1 percent were designated as low-income CTs, 23.3 percent were designated as moderate-income CTs, 31.6 percent were middle-income CTs, 31.7 percent were upper-income CTs, and the remaining 1.3 percent were designated as unknown income CTs. The AA meets regulatory requirements and does not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

The populations of the Chicago MMSA as reported through the 2020 U.S. Census was 9,229,388 of which 9.1 percent were low-income individuals, and 22.9 percent were moderate-income individuals.

As of June 30, 2024, the bank had \$16.4 billion in deposits representing 40.5 percent of the bank's total deposits. During the evaluation period, the bank made \$3.0 billion or 29.1 percent of its dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

¹ MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

The bank operates 86 full-service branches and 120 deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 149 FDIC-insured institutions operating 2,119 branches in the AA. The bank ranked eighth in deposit market share with 2.8 percent. The top five institutions by market share of the AA are JP Morgan Chase N.A., BMO Bank N.A., Bank of America N.A., CIBC Bank USA, and The Northern Trust Company. The top five banks hold a combined 59.5 percent market share. Significant competition for loans exists in the AA.

According to Moody's report for August 2025, the Chicago, IL AA strengths include being a major center for business, distribution, transportation and finance, having a huge talent pool, and having a strong roster of well-regarded educational institutions and budding high-tech center. Weaknesses include state and local budget pressures, weak population trends and high crime rate. Major employment industries include professional and business services, education and health services, government, leisure and hospitality services and retail trade. Major employers include Amazon, Advocate Health Care System, Northwestern Memorial Healthcare, University of Chicago and Walgreens Boots Alliance, Inc.

According to the US Bureau of Labor Statistics, employment improved in the Chicago MMSA, from 5.1 percent at the beginning of the assessment period, to 4.5 percent at the end of the assessment period. During the same period, the Lake County-Porter County-Jasper County- IN MD, also part of the larger Chicago MMSA saw an increase in unemployment from 4.8 percent to 5.4 percent. The Chicago MMSA had unemployment levels at 6.2 percent, above the broader IL statewide level at 4.4 percent as of the end of the evaluation period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulties meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2020 U.S. Census, 8.2 percent of families in the Chicago MMSA are living below the poverty line.

According to the 2020 U.S. Census demographic data, the number of housing units in the AA was 3.7 million at the end of the assessment period. Of that amount, 2.2 million are owner-occupied, while 1.2 million are occupied rental units, and 295,541 units sit vacant, representing 59.3 percent, 32.7 percent, and 8.0 percent of total housing units, respectively. The median housing value of housing units for the Chicago MMSA was \$236,700 at the end of the assessment period.

The OCC evaluated the difference between the median income of families within the AA and the cost of housing. Low-income families earned less than \$3,859 within the AA, while moderate-income families earned from \$3,859 to \$6,174 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the evaluation period, the calculated maximum affordable monthly mortgage payment \$1,158 for a low-income borrower and from \$1,852 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$1,575. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for a mortgage loan at the median housing value within the AA.

The OCC utilized two community contacts from 2024 for this evaluation. The first contact worked for an affordable housing organization that provides financial literacy training and resources for first-time

home buyers within the AA. This organization also aids individuals in the way of financial support for utility and up to \$10,000 for down payment assistance. This contact specifically stated that a member of leadership for ONB also serves on the board of directors for this organization, and had done so for many years, providing guidance to how the organization operates. The second community contact also worked for an affordable housing organization, specifically focused on the outer areas of the AA, away from the population center. The contact noted that many larger banks typically give most of their attention to Chicago proper, though did name ONB as a notable benefactor in providing funding and purchasing loans to support the community land trust program for affordable housing.

Assessment Area(s) - Chicago MMSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,237	12.11	23.29	31.65	31.60	1.34
Population by Geography	9,229,388	9.05	22.89	34.01	33.40	0.65
Housing Units by Geography	3,696,253	9.62	22.53	33.76	33.49	0.60
Owner-Occupied Housing by Geography	2,193,384	4.63	18.86	37.07	39.10	0.33
Occupied Rental Units by Geography	1,207,328	16.11	28.16	29.59	25.14	1.00
Vacant Units by Geography	295,541	20.18	26.74	26.15	25.92	1.01
Businesses by Geography	362,137	5.85	17.26	32.44	43.92	0.45
Farms by Geography	7,397	4.41	18.47	38.76	38.07	0.30
Family Distribution by Income Level	2,190,088	23.10	16.76	19.31	40.82	0.00
Household Distribution by Income Level	3,400,712	25.45	15.44	17.01	42.10	0.00
Unemployment rate (%)	6.19	14.81	8.26	5.25	3.87	8.87
Households Below Poverty Level (%)	11.29	29.98	15.48	8.94	5.91	27.28
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		\$92,622			Median Housing Value	\$236,700
Median Family Income (20994 - Elgin, IL MD)		\$97,326			Median Gross Rent	\$1,147
Median Family Income (29404 - Lake County, IL MD)		\$112,326			Families Below Poverty Level	8.19
Median Family Income (29414 - Lake County-Porter County-Jasper County, IN MD)		\$75,625				
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2024		\$109,800				
Median Family Income (20994 - Elgin, IL MD) for 2024		\$113,700				
Median Family Income (29404 - Lake County, IL MD) for 2024		\$129,600				
Median Family Income (29414 - Lake County-Porter County-Jasper County, IN MD) for 2024		\$91,100				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Chicago MMSA 2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,280	12.02	23.25	32.19	31.14	1.40
Population by Geography	9,398,539	8.98	22.69	34.64	33.02	0.66
Housing Units by Geography	3,767,008	9.51	22.35	34.45	33.06	0.63
Owner-Occupied Housing by Geography	2,236,299	4.63	18.56	37.83	38.64	0.34
Occupied Rental Units by Geography	1,229,008	15.83	28.24	30.10	24.77	1.05
Vacant Units by Geography	301,701	19.94	26.38	27.11	25.48	1.09
Businesses by Geography	375,886	5.92	16.91	32.73	43.87	0.56
Farms by Geography	7,902	4.34	17.48	39.64	38.10	0.44
Family Distribution by Income Level	2,232,108	23.08	16.80	19.35	40.78	0.00
Household Distribution by Income Level	3,465,307	25.43	15.44	17.03	42.10	0.00
Unemployment rate (%)	6.19	14.81	8.28	5.26	3.85	8.91
Households Below Poverty Level (%)	11.29	29.95	15.62	8.91	5.91	26.95
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		\$92,622		Median Housing Value		\$235,000
Median Family Income (20994 - Elgin, IL MD)		\$97,326		Median Gross Rent		\$1,141
Median Family Income (23844 - Gary, IN MD)		\$75,625		Families Below Poverty Level		8.19
Median Family Income (29404 - Lake County, IL MD)		\$105,876				
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2023		\$109,800				
Median Family Income (20994 - Elgin, IL MD) for 2023		\$113,500				
Median Family Income (23844 - Gary, IN MD) for 2023		\$91,900				
Median Family Income (29404 - Lake County, IL MD) for 2023		\$124,600				
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Chicago MMSA

We conducted a full-scope review of the Chicago MMSA. When evaluating performance for the Lending Test we gave more weight to HMDA performance, as compared to small business and small farm loans, due to it comprising 65.6 percent of all HMDA, small business, and small farm loan originations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHICAGO MMSA

LENDING TEST

The bank's performance under the Lending Test in the Chicago MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Chicago MMSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								2022-2024	
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Chicago MMSA	6,267	3,083	208	220	NA	9,778	100.00	100.0	
Total	6,267	3,083	208	220	NA	9,778	100.00	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Chicago MMSA	1,927,830	1,064,744	44,622	563,184	NA	3,600,380	100.00	100.0	
Total	1,927,830	1,064,744	44,622	563,184	NA	3,600,380	100.00	100.0	
<i>Source: 1/1/2022 – 12/31/2024 Bank Data.</i>									
<i>Due to rounding, totals may not equal 100.0%</i>									

According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$16.4 billion in deposits in the Chicago MMSA. The bank deposits were equivalent to a 2.8 percent deposit market share in the AA. The bank deposit market share ranked eighth out of 149 deposit taking institutions. The bank market share ranking was in the top 5.4 percent.

According to 2024 peer HMDA data, the bank made 2,010 mortgage loans totaling \$483.4 million. The bank's HMDA originations were equivalent to a 1.1 percent market share of HMDA originations. The bank's market share of HMDA originations was significantly below its deposit market share. The bank's market share of HMDA originations ranked 22nd of 869 home mortgage lenders in the AA. The bank's market share ranking was in the top 2.5 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small business data, the bank made 1,077 loans totaling \$374.2 million. The bank's small business loan originations were equivalent to a 0.4 percent market share in the AA. The bank's market share of small business loan originations was significantly below its deposit market share. The bank's market share of small business loan originations ranked 22nd out of 262 small business lenders. The bank's market share ranking, relative to all lenders, ranked in the top 8.4 percent of all lenders. The bank's market share ranking, relative to all lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small farm data, the bank made 69 loans totaling \$14.4 million. The bank's small farm loan originations were equivalent to a 6.5 percent market share in the AA. The bank's market share of small farm loan originations exceeds its deposit market share. The bank's market share of small farm loan originations ranked fifth out of 39 small farm lenders. The bank's market share ranking, relative to all lenders, ranked in the top 12.8 percent of all lenders. The bank's market share ranking, relative to all lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table 7 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographical distribution of home mortgage loans was good. For 2022 through 2023, the proportion of home mortgage originations in low-income CTs was well below both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies. The proportion of home mortgage originations in moderate-income CTs was below both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies. For 2024, the geographic distribution of home mortgage loans was stronger than performance from 2022 through 2023. Stronger performance was due to excellent performance as compared to the demographic and aggregate in LMI geographies.

Small Loans to Businesses

Refer to Table 9 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographical distribution of small loans to businesses was excellent. In 2022 through 2023, the proportion of bank small loans to businesses in low-income CTs approximated the percentage of businesses and exceeded the aggregate industry distribution of loans to those geographies. The proportion of the bank's small loans to businesses in moderate-income CTs exceeded both the percentage of businesses and the aggregate industry distribution of loans to those geographies. Performance in 2024 was consistent with bank performance from 2022 through 2023.

Small Loans to Farms

Refer to Table 11 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was poor. For 2022 through 2023, the bank did not make any small loans to farms in low-income geographies. The proportion of the bank's small loans to farms in moderate-income geographies was significantly below the percentage of farms and well below the aggregate industry distribution of loans in those geographies. In 2024, performance was consistent with performance from 2022 through 2023.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans was excellent. For the evaluation period, when evaluating performance of borrower distribution, examiners considered the fact that housing was not considered affordable for low-income people. Therefore, we placed more significance on performance to low-income borrowers on the bank loans compared to the aggregate. For 2022 through 2023, the proportion of bank home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and approximated the aggregate industry distribution of loans to those borrowers. The proportion of bank loans to moderate-income borrowers exceeded the percentage of moderate-income families and was below the aggregate industry distribution of loans to those borrowers. Performance in 2024, was stronger than performance from 2022 through 2023. Stronger performance was due to the proportion of bank loans exceeding the aggregate for low-income borrowers and exceeding both the demographic and aggregate for moderate-income borrowers.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The bank exhibits a poor borrower distribution of small loans to businesses. For 2022 through 2023, the proportion of bank loans to businesses with revenues less than \$1 million was significantly below the percentage of small businesses and well below the aggregate industry distribution of loans to those businesses. Performance in 2024 was consistent with performance from 2022 through 2023.

Small Loans to Farms

Refer to Table 12 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The bank exhibited good borrower distribution of small loans to farms. For 2022 through 2023, the proportion of bank loans to farms with revenues less than \$1 million was below the percentage of farms and exceeded the aggregate industry distribution of loans to those borrowers.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating in the Chicago MMSA.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made an excellent level of CD loans. During the evaluation period, ONB originated 220 CD loans totaling \$563.2 million. This equated to 29.3 percent of allocated tier 1 capital. The bank's CD loans were responsive to community service and economic development, with 37.1 percent of loans

benefitting community service and 24.5 percent of loans benefitting economic development. The bank's CD loans demonstrated leadership and complexity.

The following are examples of CD loans the bank originated or purchased in the MMSA:

- ONB provided a community development loan to a not-for profit 501(c)(3) to support operating expenses. The loan supports operating expenses of the organization, which delivers essential services to LMI individuals and individuals with disabilities. The company provides housing and support for individuals with developmental disabilities, offers vocational training and employment support, facilitates community integration and daily living skills, and delivers mental health services and counseling.
- ONB funded an economic development initiative designed to serve the LMI residents of a neighborhood on Chicago's west side. The project involves the construction of a multi-tenant office facility. The facility will house four tenants, including a café and small business incubator space. The incubator will offer below-market rents to local small businesses, fostering economic growth and collaboration among entrepreneurs in the community.
- ONB provided two community development loans totaling \$10 million to finance the purchase of an adjacent real estate property that will be used to expand the businesses operations. The company employes 650+ people in production/manufacturing, engineering, sales and other administrative roles.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending products in order to serve AA credit needs. See "Lending in Assessment Area" section for details on innovative and flexible loan programs.

The bank made 113 loans totaling \$21.1 million that benefited LMI people for affordable housing. These programs offered had features such as low-down payments, lessened mortgage insurance options, and flexible underwriting. Additionally, the bank made 106 loans for \$128 million under various SBA loan programs.

INVESTMENT TEST

The institution's performance under the Investment Test in the Chicago MMSA is rated Outstanding.

The institution exhibited excellent responsiveness to credit and community development needs. The institution made significant use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago MMSA	735	98,036	1,481	225,797	2,216	100.0	323,833	100.0	0	0
Total	735	98,036	1,481	225,797	2,216	100.0	323,833	100.0	0	0

The institution had an excellent level of qualified investments, including grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. In total the bank had 2,216 qualified CD investments totaling \$323.8 million. The dollar volume of current and prior period investments represented 16.9 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution made significant use of innovative and/or complex investments to support CD initiatives. By dollar volume, 83.9 percent of investments supported affordable housing, 1.6 percent supported community services, 13.8 percent promoted economic development, and 0.8 percent funded revitalization/stabilization efforts. The following are examples of qualified investments in the MMSA:

- A \$4.2 million New Market Tax Credit (NMTC) investment to promote economic development in an underserved area. The investment was used to rehabilitate a building, which will be used to offer tech training courses and apprenticeship programs.
- A \$14.2 million Low Income Housing Tax Credit (LIHTC) to support the development of affordable housing. The investment supported the building of a 50-unit community that will serve families with incomes between 30 and 80 percent of the area median family income.
- A \$100,000 grant to an economic development organization to aid in business development and strengthen small businesses in an LMI area. The grant will be used to fund microgrants to small businesses to promote growth and sustainability.

SERVICE TEST

The institution's performance under the Service Test in Chicago MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Chicago MMSA was good.

Retail Banking Services

Service delivery systems were accessible geographies and individuals of different income levels in the institution's AA.

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits		Branches						Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Chicago MMSA	100.0	86	100.0	4.7	20.9	46.5	27.9	0.0	9.1	22.9	34.0	33.4	0.6
Total	100.0	86	100.0	4.7	20.9	46.5	27.9	0.0	9.1	22.9	34.0	33.4	0.6

Source: FFIEC File – 202 U.S. Census
12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

The branch distribution was accessible. The bank had 86 branch locations in the Chicago MMSA. The proportion of bank branches in low-income CTs was well below the percentage of the population in those geographies. The proportion of bank branches in moderate-income CTs was near to the percentage of the population in those geographies. Bank management used maps of branch locations and transaction data to identify branches in middle- and upper-income tracts (MUI) that enhanced accessibility to bank products and services for residents in LMI tracts. Management provided analysis showing branches located in MUI tracts were near to LMI tracts and enhanced accessibility to bank products and services for residents of those tracts. Four of the branches were near to low-income tracts and eleven branches were near to moderate-income tracts. Positive consideration was given to the enhanced accessibility provided by those branches when concluding on the accessibility of bank delivery systems to individuals and geographies of all income levels within the Chicago MMSA.

The bank did not open or close branches during the evaluation period.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking. The bank had 120 deposit-taking ATMs in the AA, of which six were in low-income CTs and 18 in moderate-income CTs.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly LMI geographies and/or individuals. All branches in the Chicago MMSA operate on similar banking hours.

Community Development Services

The institution provided a relatively high level of CD services.

During the evaluation period, bank employees contributed a total of 3,615 hours on 1,318 instances to organizations supporting LMI individuals and families. This included serving on committees and boards that promote community services, economic development and revitalization/stabilization for LMI communities within the AA.

The following are examples of CD services provided in this AA:

- A bank employee provided community development hours as a board member to support an organization’s affordable housing counseling and financial education program by supporting LMI households to resources that create housing, stability, homeownership, and economic mobility. Aside from being a board member the employee also provides technical assistance and strategic planning support.

- A bank employee provided affordable housing hours to support an organization's affordable rental housing program focusing on multi-family housing in LMI and majority minority communities.
- A bank employee provided community service hours serving in a technical assistance and board member capacity to support behavioral health, substance abuse and domestic violence in LMI communities.

Multistate Metropolitan Statistical Area Rating

Davenport MMSA

CRA rating for the Davenport MMSA²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes.
- The bank was a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.
- The institution had an excellent level of qualified investments, including grants.
- Service delivery systems were readily accessible to geographies and individuals of different income levels. The bank was a leader in providing CD services.

Description of Institution's Operations in Davenport MMSA

ONB Davenport-Moline-Rock Island IA-IL MSA (Davenport MMSA) consists of two whole counties: Scott (IA) and Rock Island (IL). As of the 2020 U.S. Census, the Davenport MMSA had 91 CTs, of which 3.3 percent are designated low-income CTs, 30.8 are designated moderate-income CTs, 48.4 percent are designated as middle-income CTs, 16.5 percent are designated as upper-income CTs, and 1.1 percent of the CTs have an unknown income designation. The AA meets regulatory requirements and does not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

As of the 2020 U.S. Census, the Davenport MMSA had a population of 319,341, of which 1.8 percent were low-income individuals, and 24.2 percent were moderate-income individuals.

As of June 30, 2024, the bank had \$416.8 million in deposits in the Davenport MMSA, representing 1.0 percent of the bank's total deposits. During the evaluation period, the bank made \$38.0 million or 0.4 percent of its dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated four full-service branches and four deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 23 FDIC-insured institutions

² MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

operating 91 branches in the AA. The bank ranked seventh in deposit market share with 5.3 percent. The top five institutions by market share in the AA are Quad City Bank and Trust Company, Blackhawk Bank & Trust, Wells Fargo, N.A. U.S. Bank N.A., and TBK Bank SSB. The top five banks hold a combined 66.5 percent of the deposit market share. Significant competition exists for loans in the AA.

According to 2024 Moody's Analytics reporting, the Davenport, IA area's strengths include below average business costs (energy and office rents), and stability from Rock Island Arsenal. Weaknesses include an aging population and a below-average concentration of prime-age workers, dearth of dynamic growth drivers, weak migration trends and below-average per capita income. Major employment industries include education and health services, government, manufacturing, retail trade and professional and business services. Major employers include John Deere & co, Rock Island Arsenal, Unity Point Health, Genesis Health Systems and Hy-Vee Inc.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Davenport MMSA ranged from 4.0 to 5.8 percent in January 2022, decreasing to 3.8 to 5.0 percent in December 2024. During the same period, the broader Illinois statewide unemployment levels were at 5.3 percent and 4.3 percent and Iowa statewide unemployment levels were at 3.7 and 3.0 percent, respectively.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulties meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2020 U.S. Census, 9.5 percent of families in the Davenport MMSA are living below the poverty line.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 12.3 percent with the number of housing units in the AA representing 140,845 at the end of the evaluation period. Of that amount, 88,458 are owner-occupied while 39,586 are occupied rental units, and 12,801 units sit vacant, representing 62.8 percent, 28.1 percent, and 9.1 percent of total housing units, respectively. The median housing value of housing units for the Davenport MMSA was \$127,400 at the end of the environment period.

The OCC evaluated the difference between the median income of families within the AA and the cost of housing. Low-income families earned less than \$3,729 within the AA, while moderate-income families earned from \$3,729 to \$5,967 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the evaluation period, the calculated maximum affordable monthly mortgage payment was \$1,119 for a low-income borrower and \$1,790 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$848. Based on these calculations, some low-income and all moderate-income borrowers would be able to qualify for a mortgage loan at the median housing value within the AA.

We utilized one community contact, from 2024, for this evaluation. The contact worked for a local economic development entity in the AA. This contact shared that increased interest rates were placing additional pressures on businesses since 2023, and have continued into 2024. Higher interest rates have deterred business owners from seeking financing for additional business activities. The contact shared that the greatest opportunity for financial institutions is providing farming equipment and machinery

loans to local businesses. The contact also noted that there was always a significant level of attendance by financial institutions at the local SBA Leaders Forum.

Assessment Area(s) - Davenport-Moline- Rock Island IA-IL MMSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	91	3.30	30.77	48.35	16.48	1.10
Population by Geography	319,341	1.75	24.17	51.81	21.67	0.60
Housing Units by Geography	140,845	2.12	25.01	51.73	20.30	0.84
Owner-Occupied Housing by Geography	88,458	1.10	18.97	55.34	24.51	0.08
Occupied Rental Units by Geography	39,586	3.76	35.80	45.94	12.36	2.13
Vacant Units by Geography	12,801	4.07	33.37	44.73	15.76	2.06
Businesses by Geography	12,475	2.47	22.53	44.34	26.80	3.86
Farms by Geography	609	0.82	11.33	48.28	38.10	1.48
Family Distribution by Income Level	80,026	19.74	18.59	21.17	40.50	0.00
Household Distribution by Income Level	128,044	23.55	16.03	18.61	41.81	0.00
Unemployment rate (%)	4.76	15.05	6.81	4.19	3.02	7.60
Households Below Poverty Level (%)	12.27	34.53	19.47	10.18	6.50	29.65
Median Family Income (19340 - Davenport-Moline-Rock Island, IA-IL MSA)		\$76,902		Median Housing Value		\$127,400
Median Family Income (19340 - Davenport-Moline-Rock Island, IA-IL MSA) for 2024		\$89,500		Median Gross Rent		\$809
				Families Below Poverty Level		9.50
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Davenport MMSA

We conducted a full-scope review of the Davenport MMSA. When determining conclusions for the Lending Test, we gave more weight to performance of home mortgage loans as compared to small business loans. We gave more weight to home mortgage performance due to it consisting of 73.1 percent of all home mortgage and small business loans combined.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DAVENPORT MMSA

LENDING TEST

The bank’s performance under the Lending Test in the Davenport MMSA is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Davenport MMSA was Excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity							2022-2024	
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
Davenport MMSA	152	62	0	6	220	100.0	100.0	
Total	152	62	0	6	220	100.0	100.0	
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% Rating Area Loans	% Rating Area Deposits	
Davenport MMSA	18,664	19,363	0	3,350	41,377	100.0	100.0	
Total	18,664	19,363	0	3,350	41,377	100.0	100.0	

Source: 1/1/2022-12/31/202 Bank Data.
Due to rounding, totals may not equal 100.0%

According to the June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$416.8 million in deposits in the Davenport MMSA. The bank deposits were equivalent to a 5.3 percent deposit market share in the AA. The bank deposit market share ranked seventh out of 23 deposit taking institutions. The bank market share ranking was in the top 30.4 percent.

According to 2024 peer HMDA data, the bank made 64 mortgage loans totaling \$8.9 million. The bank's HMDA originations were equivalent to a 0.8 percent market share of HMDA originations. The bank's market share of HMDA originations was significantly below its deposit market share. The bank's market share of HMDA originations ranked 31st out of 247 home mortgage lenders in the AA. The bank's market share ranking was in the top 12.6 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small business data, the bank made 27 loans totaling \$8.1 million. The bank's small business loan originations were equivalent to a 0.6 percent market share in the AA. The bank's market share of small business loan originations was significantly below its deposit market share. The bank's market share of small business loan originations ranked 14th out of 88 small business lenders. The bank's market share ranking, relative to all lenders, ranked in the top 15.9 percent of all lenders. The bank's market share ranking, relative to all lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table 7 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent. Examiners considered the low percentage of both owner-occupied housing and the aggregate industry performance in low-income CTs, therefore placed more weight on performance in moderate-income CTs. The bank did not make any home mortgage loans in low-income geographies. The proportion of home mortgage originations in

moderate-income CTs exceeded both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

Refer to Table 9 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographical distribution of small loans to businesses was excellent. The proportion of bank small loans to businesses in LMI CTs exceeded both the percentage of businesses and the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans was excellent. The proportion of bank home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate industry distribution of loans to those borrowers. The proportion of bank loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The bank exhibited a very poor borrower distribution of small loans to businesses. The proportion of bank loans to businesses with revenues less than \$1 million was significantly below both the percentage of small businesses and the aggregate industry distribution of loans to those businesses.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating in the Davenport MMSA.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made an excellent level of CD loans. During the evaluation period, ONB originated six CD loans totaling \$3.4 million. This equates to 6.8 percent of allocated tier 1 capital. All six CD loans were for community service.

The following are examples of CD loans the bank originated or purchased in the MMSA:

- ONB provided three loans totaling \$2.5 million to a community service organization focused in providing patient-centered medical, dental, and behavioral health care that is compassionate, affordable, and accessible. The organization primarily serves LMI individuals, addressing critical health care needs and reducing barriers to care. These loans supported the organization’s operational needs, ensuring continued delivery of essential health services to the communities it serves.
- ONB provided two community development loans totaling \$750,000 to a nonprofit organization that delivers critical services such as domestic violence prevention, counseling, youth support programs, and crisis intervention. These programs primarily serve LMI individuals and families, addressing safety, stability, and well-being in the community. The organization provides essential services to LMI populations and strengthens community welfare.

Product Innovation and Flexibility

The institution made use of innovative and/or flexible lending practices in order to serve AA credit needs. See the *Lending in Assessment Area* section for details on loan programs and loan volumes.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Davenport MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Davenport MMSA was excellent.

The institution exhibited adequate responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Davenport MMSA	54	3,633	36	1,694	90	100.0	5,327	100.0	0	0
Total	54	3,633	54	1,694	90	100.0	5,327	100.0	0	0

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. In total, the bank had 90

qualified CD investments totaling \$5.3 million. The dollar volume of current and prior period investments was equivalent to 10.9 percent of allocated tier 1 capital.

The institution exhibited adequate responsiveness to credit and community development needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume, 98.4 percent of investments supported affordable housing, 1.5 percent supported community services, and 0.1 percent promoted economic development. The following are examples of qualified investments in the AA:

- Five investments in mortgage-backed securities (MBS) totaling \$701,029. These investments supported affordable housing in the AA.
- Two grants totaling \$30,000 to an affordable housing organization serving LMI individuals and families. The grants supported a program that provides rental counseling, pre- and post-purchase counseling, and foreclosure prevention support.
- A \$15,000 grant supporting a nonprofit organization that provided services to individuals and families experiencing homelessness. The organization offers emergency shelters for both men and women, providing shelter for up to 42 men and 20 women.

SERVICE TEST

The institution’s performance under the Service Test in the Davenport MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Davenport MMSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’s AA.

Assessment Area	Deposits		Branches						Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Davenport MMSA	100.0	4	100.0	25.0	25.0	25.0	25.0	0.0	1.7	24.2	51.8	21.7	0.6
Total	100.0	4	100.0	25.0	25.0	25.0	25.0	0.0	1.7	24.2	51.8	21.7	0.6

*Source: FFIEC File – 2020 U.S. Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%*

The retail branch distribution was readily accessible to geographies and individuals of different income levels. The bank had four retail locations in the Davenport MMSA. The proportion of bank branches located in both low-income CTs and moderate-income CTs exceeded the percentage of the population in those geographies.

The bank did not open or close branches during the evaluation period.

The bank complements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking located in LMI geographies. The bank operates four deposit-taking ATMs in the MMSA, of which two were in LMI geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly LMI geographies and/or individuals. Branches in the MMSA operate on similar hours.

Community Development Services

The institution provided a good level of CD services.

During the evaluation period, bank employees contributed 165 hours on 63 instances to organizations supporting LMI individuals and families. This included serving on committees and boards that promote community services, economic development and revitalization/stabilization for LMI communities within AA.

The following are examples of CD services provided in this AA:

- A bank employee provided technical assistance to support a nonprofit economic development organization dedicated to revitalizing and redeveloping underserved areas through affordable housing and infrastructure improvements.
- A bank employee provided technical assistance and attended board meetings to support a nonprofit organization that provides housing needs and food insecurity to LMI individuals.

Multistate Metropolitan Statistical Area Rating

Evansville MMSA

CRA rating for the Evansville MMSA³: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes.
- The bank was a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating.
- The institution had an excellent level of qualified investments, including grants.
- Service delivery systems were readily accessible to geographies and individuals of different income levels. The bank was a leader in providing CD services.

Description of Institution's Operations in Evansville MMSA

ONB's Evansville-Henderson IN-KY MSA (Evansville MMSA) consists of the following whole counties: Posey, Vanderburgh and Warrick Counties (IN) and Henderson County (KY) (Henderson County is 2022 through 2023 only). As of the 2020 U.S. Census, the Evansville MMSA had 96 CTs, of which 11.5 percent are designated low-income CTs, 22.9 percent are designated moderate-income CTs, 36.5 percent are designated as middle-income CTs, 22.9 percent are designated as upper-income CTs, and 6.2 percent of the CTs have an unknown income designation. The AA meets regulatory requirements and does not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

As of the 2020 U.S. Census, the Evansville MMSA had a population of 314,049, of which 7.8 percent were low-income individuals, and 21.8 percent were moderate-income individuals.

As of June 30, 2023, the bank had \$4.2 billion in deposits in the Evansville MMSA. During the evaluation period, the bank made \$348,751 or 3.3 percent of its dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated 13 full-service branches and 21 deposit taking ATMs within this AA. According to the June 30, 2023, FDIC deposit-market share report, there were 18 FDIC-insured institutions operating

³ MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

84 branches in the AA. The bank ranked first in deposit market share with 31.8 percent. The top four institutions by market share in the AA are ONB, United Fidelity Bank, FSB, Fifth Third Bank, N.A., and German American Bank. The top five banks hold a combined 86.5 percent of the deposit market share. Significant competition exists for loans in the AA.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Evansville MMSA decreased from 4.7 percent in January 2022 to 3.6 percent in December 2024. During the same period, the broader Indiana statewide unemployment levels were at 3.4 percent and 4.0 percent.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulties meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2020 U.S. Census, 9.6 percent of families in the Evansville MMSA are living below the poverty line.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 13.6 percent with the number of housing units in the AA representing 142,916 at the end of the evaluation period. Of that amount, 89,642 are owner-occupied while 40,182 are occupied rental units, and 13,092 units remain vacant, representing 62.7 percent, 28.1 percent, and 9.2 percent of total housing units, respectively. The median housing value of housing units for the Evansville MMSA was \$124,300 at the end of the evaluation period.

The OCC evaluated the difference between the median income of families within the AA and the cost of housing. Low-income families earned less than \$3,040 within the AA, while moderate-income families earned from \$3,040 to \$4,864 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant’s income. For the evaluation period, the calculated maximum affordable monthly mortgage payment was \$912 for a low-income borrower and \$1,459 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$827. Based on these calculations, some low-income and all moderate-income borrowers would be able to qualify for a mortgage loan at the median housing value within the AA.

The OCC utilized two community contacts for this evaluation from 2022 and 2024. The first contact worked for a local economic development entity in the AA that supports the entrepreneurial growth of businesses at all stages. This contact shared that their organization received strong support from local financial institutions. The second contact provides realty services to potential buyers and sellers of residential and commercial properties. The contact noted that unemployment is higher in certain counties and many residents are forced to commute a long distance for work. It was also noted, that while housing stock increased, buyers are deterred by increasing interest rates.

Assessment Area(s) - Evansville MMSA 2023						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	96	11.46	22.92	36.46	22.92	6.25
Population by Geography	314,049	7.84	21.81	38.84	31.33	0.16
Housing Units by Geography	142,916	9.25	23.64	39.33	27.41	0.33
Owner-Occupied Housing by Geography	89,642	5.16	18.10	43.08	33.47	0.19
Occupied Rental Units by Geography	40,182	14.74	34.34	33.38	17.10	0.43

Assessment Area(s) - Evansville MMSA 2023						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Vacant Units by Geography	13,092	20.39	28.80	32.06	17.59	1.27
Businesses by Geography	11,725	8.01	22.17	32.07	31.62	6.12
Farms by Geography	685	2.71	12.12	49.05	35.47	0.53
Family Distribution by Income Level	83,570	21.25	17.70	21.02	40.03	0.00
Household Distribution by Income Level	129,824	23.56	16.62	17.62	42.20	0.00
Unemployment rate (%)	4.44	10.25	5.15	4.35	2.63	12.57
Households Below Poverty Level (%)	13.64	31.23	17.97	12.83	6.26	8.07
Median Family Income (21780 - Evansville, IN MSA)		\$72,963		Median Housing Value		\$124,300
Median Family Income (21780 - Evansville, IN MSA) for 2023		\$87,300		Median Gross Rent		\$783
				Families Below Poverty Level		9.64
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Evansville MMSA

We conducted a full-scope review on the bank’s only AA, the Evansville MMSA. Performance in this rating area is for the entirety of 2022 and 2023 only. When determining conclusions for the Lending Test we gave more weight to performance of home mortgage loans due to the fact it comprises 56.6 percent of all home mortgage and small business loan originations. The bank did not originate enough small farm loans to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN EVANSVILLE MMSA

LENDING TEST

The bank’s performance under the Lending Test in the Evansville MMSA is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Evansville MMSA was excellent.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity									2022-2023
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Evansville MMSA	1,031	791	17	13	NA	1,852	100.0	100.0	
Total	1,031	791	17	13	NA	1,852	100.0	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Evansville MMSA	163,093	182,434	3,224	80,576	NA	429,327	100.0	100.0	
Total	163,093	182,434	3,224	80,576	NA	429,327	100.0	100.0	
Source: 1/1/2022 - 12/31/2023 Bank Data.									
Due to rounding, totals may not equal 100.0%									

According to June 30, 2023, FDIC Summary of Deposit Reports, the bank had \$4.2 billion in deposits in the Evansville MMSA. The bank deposits were equivalent to a 35.5 percent deposit market share in the AA. The bank's deposit market share ranked first out of 18 deposit taking institutions. The bank's market share ranking was first in the AA.

According to 2023 peer HMDA data, the bank made 465 mortgage loans totaling \$70.3 million. The bank's HMDA originations were equivalent to 5.9 percent market share of HMDA originations. The bank's market share of HMDA originations is significantly below its deposit market share. The bank's market share of HMDA originations ranked fifth out of 268 home mortgage lenders in the AA. The bank's market share ranking was in the top 1.9 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small business data, the bank made 400 loans totaling \$94.1 million. The bank's small business loan originations were equivalent to a 8.9 percent market share in the AA. The bank's market share of small business loan originations is significantly below its deposit market share. The bank's market share of small business loan originations ranked fifth out of 74 small business lenders. The bank's market share ranking, relative to all lenders, ranked in the top 6.8 percent of all lenders. The bank's market share ranking, relative to all lenders, was consistent with its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table 7 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good. The proportion of bank home mortgage loans in low-income CTs exceeded both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies. The proportion of bank home mortgage loans in moderate-income CTs was below both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

Refer to Table 9 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good. The proportion of bank small loans to businesses in low-income CTs exceeded both the percentage of businesses and the aggregate industry distribution of loans to those geographies. The proportion of bank loans to moderate-income CTs was below both the percentage of businesses and the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans was excellent. The proportion of bank loans to low-income borrowers was well below the percentage of owner-occupied housing and exceeded the aggregate industry distribution of loans to those borrowers. The proportion of bank loans to moderate-income borrowers exceeded the percentage of families and was near to the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses was poor. The proportion of bank small loans to businesses was significantly below the percentage of businesses and well below the aggregate industry distribution of loans to those businesses.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made an excellent level of CD loans. During the evaluation period, ONB originated 13 CD loans totaling \$80.6 million. This equated to 15.3 percent of allocated tier 1 capital. The bank showed responsiveness with 95.1 percent of loans in revitalization and stabilization of a moderate-income geography, 3.7 percent of loans in community service, and 1.2 percent of loans in affordable housing.

The following are examples of CD loans the bank originated or purchased in the MMSA:

- ONB provided two loans totaling \$42.9 million for working capital, to retain and create jobs within a moderate-income geography. The CD loans benefitted revitalization and stabilization of

a moderate-income geography. The organization focused on providing and selling various sporting indoor and outdoor game recreation and fitness products.

- ONB provided two loans totaling \$15.2 million to finance energy savings, water conservation, and control upgrades at several facilities within the school district. The CD loans benefited community service. The second loan was to partially fund the purchase of HP Chromebooks. The majority of the students are eligible for free or reduced-price lunch.
- ONB provided one loan totaling \$6.9 million to finance an infrastructure project that supported affordable housing. The funds are used to construct multi-family housing, retail space, and a hotel. This will create new jobs in the moderate-income tract.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. See the *Lending in Assessment Area* section for details on loan programs.

The bank made 62 loans totaling \$8.3 million that benefited LMI borrowers to secure financing for home loans. The bank’s programs offered low downpayments, no private mortgage insurance, and alternative credit history. Additionally, the bank made 10 loans for \$7.5 million under various SBA programs.

INVESTMENT TEST

The institution’s performance under the Investment Test in Evansville MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Evansville MMSA was excellent.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Table 4: Qualified Investments									2022-2023	
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Evansville MMSA	76	22,836	181	16,715	257	100.0	39,551	100.0	0	0
Total	76	22,836	181	16,715	257	100.0	39,551	100.0	0	0

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors. In total the bank had 257 qualified CD investments totaling \$39.6 million. The dollar volume of current and prior period investments represented 7.5 percent of allocated tier 1 capital. Bank CD investments demonstrated leadership and complexity.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. Bank CD investments were responsive to affordable housing needs. The bank CD investments did not

demonstrated some complexity and leadership. The following are examples of qualified investments in the AA:

- A \$6.5 million LIHTC investment fund supporting 15 affordable housing projects. The fund will expand access to safe, quality housing for low-income individuals.
- A \$10,000 grant benefiting community service. The grant went to an organization providing transportation services to those in need. The grant helps the organization provide free transportation in a wheelchair accessible vehicle. This primarily benefited LMI people.
- A \$20,000 grant to an affordable housing organization building homes for LMI families. This grant supported the construction of 20 houses, which primarily benefited LMI people.

SERVICE TEST

The institution’s performance under the Service Test in Evansville MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Evansville MMSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’s AA.

Assessment Area	Deposits		Branches					Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Evansville MMSA	100.0	13	100.0	7.7	30.8	15.4	38.5	7.6	7.8	21.8	38.8	31.4	0.2
Total	100.0	13	100.0	7.7	30.8	15.4	38.5	7.6	7.8	21.8	38.8	31.4	0.2

*Source: FFIEC File – 2020 U.S. Census
1/1/2022 – 12/31/2023 Bank Data
Due to rounding, totals may not equal 100.0%*

The branch distribution was readily accessible. The bank had 13 retail branches in the Evansville MMSA. The proportion of bank branches in low-income geographies approximated the percentage of the population. The proportion of branches in moderate-income CTs exceeded the percentage of the population in those geographies.

The bank did not open or close branches during the evaluation period.

The bank complements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking located in low- and moderate-income geographies. The bank operated four deposit-taking ATMs in the MMSA, of which two were in LMI geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly LMI geographies and/or individuals.

Community Development Services

The institution was a leader in providing CD services.

During the evaluation period, the bank employees contributed a total of 4,681 hours on 2,248 instances supporting organizations that provide community services, affordable housing, economic development and revitalization to LMI individuals and households across the AA. Bank employees served in technical assistance and financial literacy roles.

The following are examples of CD services provided in this AA:

- Bank employees provided community service hours serving as board members and accounting oversight to a non-profit organization that fundraises through charitable giving and world-class sporting events. Funds raised support financial assistance voucher programs to LMI families with child-care needs.
- Bank employees provided community service hours to support an organization that aids in temporary refuge for the homeless in LMI geographies. The organization provides meals, laundry facilities, hygiene items and resources to help the less fortunate move towards permanent housing. Bank employees serve as board members, provide technical assistance and assist with charitable and sponsorship events.

Multistate Metropolitan Statistical Area Rating

Louisville MMSA

CRA rating for the Louisville MMSA⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited good geographic distribution of loans.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and business.
- The institution was a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating.
- The institution had an excellent level of qualified investments, including grants.
- Service delivery systems were unreasonably inaccessible to geographies and individuals of different income levels. The bank provided an adequate level of CD services.

Description of Institution's Operations in Louisville MMSA

ONB's Louisville/Jefferson County-Elizabethtown, KY-IN MMSA (Louisville MMSA) is comprised of two whole counties: Clark (IN) and Jefferson (KY). As of the 2020 U.S. Census, the Louisville MMSA contained 243 census tracts, of which 11.5 percent were designated as low-income CTs, 25.9 percent as moderate-income CTs, 36.2 were middle-income CTs, 23.5 were upper-income CTs, and the remaining 2.9 percent were designated as unknown income CTs. The AA meets regulatory requirements and does not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

The populations of the Louisville MMSA as reported through the 2020 U.S. Census was 904,062 of which 7.7 percent were low-income individuals, and 24.7 percent were moderate-income individuals.

As of June 30, 2024, the bank had \$394.2 million in deposits representing 1.0 percent of the bank's total deposits. During the evaluation period, the bank made \$240.9 million or 2.3 percent of its dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated three full-service branches and three deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 32 FDIC-insured institutions operating 233 branches in the AA. The bank ranked 11th in deposit market share with 1.2 percent. PNC

⁴ MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Bank, NA leads the market, followed by JPMorgan Chase Bank, NA, Stock Yards Bank and Trust Company, and Fifth Third Bank, NA. The top four banks hold a combined 73.6 percent market share. Significant competition for loans exists in the AA.

According to 2024 Moody's Analytics reporting, the Louisville, KY area's strengths include low office rents and below-average energy and tax costs, an abundance of skilled manufacturing workers and the home of United Parcel Service (UPS)'s largest air hub. Weaknesses include sluggish population growth, lack of dynamic, high-paying industries, and an overreliance on manufacturing and logistics jobs. Major employment industries include education and health services, professional and business services, manufacturing, government and leisure and hospitality services. Major employers include UPS, Norton Healthcare, and U of L Health.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Louisville MSA ranged from 3.0 to 4.0 percent in January 2022, increasing to 3.8 to 4.8 percent in December 2024. During the same period, the broader Indiana statewide unemployment levels were at 3.4 percent and 4.0 percent and Kentucky statewide unemployment levels were at 4.6 and 5.0 during the same evaluation period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulties meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2020 U.S. Census, 9.1 percent of families in the Louisville MMSA are living below the poverty line.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 12.5 percent, with the number of housing units in the AA representing 398,310 at the end of the evaluation period. Of that amount, 227,321 are owner-occupied, while 134,114 are occupied rental units, and 36,875 units sit vacant, representing 57.1 percent, 33.6 percent, and 9.3 percent of total housing units, respectively. The median housing value of housing units for the Louisville MMSA was \$151,000 at the end of the evaluation period.

The OCC evaluated the difference between the median income of families within the AA and the cost of housing. Low-income families earned less than \$3,204 within the AA, while moderate-income families earned from \$3,204 to \$5,126 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the evaluation period, the calculated maximum affordable monthly mortgage payments are \$961 for a low-income borrower and \$1,538 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$1,005. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for a mortgage loan at the median housing value within the AA.

The OCC utilized two community contacts made during the evaluation period, including two economic development organizations with one being a non-profit and one a chamber of commerce. These community contacts indicated the needs for startup capital, home repair loans, infrastructure financing, and workforce housing.

Assessment Area(s) - Louisville-Jeferson County KY-IN MMSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	243	11.52	25.93	36.21	23.46	2.88
Population by Geography	904,062	7.69	24.67	39.02	27.39	1.23
Housing Units by Geography	398,310	8.45	24.87	39.28	25.83	1.57
Owner-Occupied Housing by Geography	227,321	3.87	20.09	42.22	33.27	0.56
Occupied Rental Units by Geography	134,114	13.72	31.44	35.90	15.81	3.12
Vacant Units by Geography	36,875	17.52	30.41	33.48	16.39	2.21
Businesses by Geography	45,203	6.62	18.68	37.83	35.07	1.80
Farms by Geography	1,321	3.48	18.32	40.12	37.47	0.61
Family Distribution by Income Level	216,218	21.83	18.72	19.77	39.68	0.00
Household Distribution by Income Level	361,435	24.46	17.29	18.68	39.58	0.00
Unemployment rate (%)	5.15	13.60	6.74	3.89	3.60	7.82
Households Below Poverty Level (%)	12.46	36.66	17.58	8.80	5.15	36.16
Median Family Income (31140 - Louisville/Jeferson County, KY-IN MSA)		\$76,893		Median Housing Value		\$151,100
Median Family Income (31140 - Louisville/Jeferson County, KY-IN MSA) for 2024		\$92,600		Median Gross Rent		\$907
				Families Below Poverty Level		9.12
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Louisville MMSA

We conducted a full-scope review on the bank’s only AA, the Louisville MMSA. When determining our conclusions for the Lending Test, examiners gave significantly more weight to performance of home mortgage loans. More weight was given to home mortgage performance due to those loans comprising 76.9 percent of all home mortgage and small business loan originations. The bank did not originate enough small farm loans to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISVILLE MMSA

LENDING TEST

The bank’s performance under the Lending Test in the Louisville MMSA is rated High Satisfactory.

Based on a full-scope review, the bank’s performance in the Louisville MMSA was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity									2024
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Louisville MMSA	342	103	0	4	NA	449	100.0	100.0	
Total	342	103	0	4	NA	449	100.0	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Louisville MMSA	213,032	27,875	0	55,065	NA	295,972	100.0	100.0	
Total	213,032	27,875	0	55,065	NA	295,972	100.0	100.0	
Source: 1/1/2022 – 12/31/2024 Bank Data.									
Due to rounding, totals may not equal 100.0%									

According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$394.3 million in deposits in the Louisville MMSA. The bank deposits were equivalent to a 1.2 percent deposit market share in the AA. The bank deposit market share ranked 11th out of 32 deposit taking institutions. The bank market share ranking was in the top 34.4 percent.

According to 2024 peer HMDA data, the bank made 140 mortgage loans totaling \$119.9 million. The bank's HMDA originations were equivalent to a 0.6 percent market share of HMDA originations. The bank's market share of HMDA originations was well below its deposit market share. The bank's market share of HMDA originations ranked 37th out of 446 home mortgage lenders in the AA. The bank's market share ranking was in the top 8.3 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small business data, the bank made 33 loans totaling \$11.6 million. The bank's small business loan originations were equivalent to 0.2 percent market share in the AA. The bank's market share of small business loan originations was significantly below its deposit market share. The bank's market share of small business loan originations ranked 35th out of 100 small business lenders. The bank's market share ranking, relative to all lenders, ranked in the top 35.0 percent of all lenders. The bank's market share ranking, relative to all lenders, was consistent with its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table 7 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good. The proportion of bank home mortgage loans to low-income CTs exceeded the percentage of owner-occupied housing and approximated the aggregate industry distribution of loans to those geographies. The proportion of bank home mortgage

loans to moderate-income CTs was below both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

Refer to Table 9 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good. The proportion of the bank's small loans to businesses in low-income geographies exceeded both the percentage of businesses and the aggregate industry distribution of loans to those borrowers. The proportion of the bank's small loans to businesses in moderate-income geographies was well below the percentage of businesses and below the aggregate industry distribution of loans to those borrowers.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans was adequate. The borrower distribution of home mortgage loans to low-income borrowers was significantly below the percentage of families and below the aggregate industry distribution of loans to those borrowers. The borrower distribution of loans to moderate-income borrowers was below both the percentage of families and the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The bank exhibited a poor borrower distribution of small loans to businesses. The borrower distribution of bank loans to businesses with revenues less than \$1 million was significantly below the percentage of businesses and well below the aggregate industry distribution of loans to those businesses.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made an excellent level of CD loans. During the evaluation period, ONB originated four CD loans totaling \$55.0 million. This equated to 119.9 percent of allocated tier 1 capital. Bank CD lending was responsive to economic development needs in the AA. All CD loans were for Economic Development. The bank’s CD loans demonstrated complexity and leadership.

An example of CD loans the bank originated or purchased in the MMSA:

- ONB provided a community development loan to support the Tax Increment Revenue Bond Anticipation Notes (BAN) issued by a local redevelopment authority. The BAN proceeds were used to procure funds for the rehabilitation, development, and redevelopment of projects within or directly benefiting a designated zone for economic revitalization.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. See the *Lending in Assessment Area* section for details on loan programs.

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. The bank made 39 loans totaling \$6.9 million that helped LMI borrowers secure financing for home loans. The bank designed a proprietary product that that offered low downpayments, no PMI, and alternative credit history. Additionally, the bank made six loans for \$5.6 million through various SBA programs.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Louisville MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Louisville MMSA is excellent.

The institution exhibited excellent responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Louisville MMSA	66	15,651	91	15,741	157	100.0	31,392	100.0	0	0
Total	66	15,651	91	15,741	157	100.0	31,392	100.0	0	0

The institution had an excellent level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. In total the bank had 157 CD investments totaling \$31.4 million. The dollar volume of current and prior period investments represented 67.8 percent of allocated tier 1 capital.

The institution exhibited good responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives. By dollar volume, 27.9 percent of investments supported affordable housing, 66.0 percent supported community services, 6.0 percent promoted economic development, and 0.1 percent funded revitalization and stabilization efforts.

The following are examples of qualified investments in the AA:

- A \$9.0 million NMTC investment used to build a campus offering a variety of community services. The campus created 200 jobs in an area with high rates of unemployment and underemployment.
- Eleven investments in MBS totaling \$4.9 million. The MBS were comprised primarily of loans to LMI borrowers. These investments supported affordable housing in the AA.
- A \$75,000 grant to an affordable housing organization. The organization develops affordable housing, as well as providing personalized plans to help individuals and families achieve homeownership.

SERVICE TEST

The institution’s performance under the Service Test in the Louisville MMSA is rated Needs to Improve.

Based on a full-scope review, the institution’s performance in the Louisville MMSA was poor.

Retail Banking Services

Service delivery systems were unreasonably inaccessible to geographies and individuals of different income levels in the institution’s AA.

Assessment Area	Deposits		Branches					Population					2024	
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Louisville MMSA	100.0	3	100.0	0.0	0.0	66.7	33.3	0.0	7.7	24.7	39.0	27.4	1.2	
Total	100.0	3	100.0	0.0	0.0	66.7	33.3	0.0	7.7	24.7	39.0	27.4	1.2	

Source: FFIEC File – 2022 U.S. Census
1/1/2022 -12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

The branch distribution was unreasonably inaccessible to significant portions of LMI geographies. The bank had three retail branches in the Louisville MMSA. The bank did not have any branches in low-income or moderate-income geographies. The proportions of retail bank branches in low- and moderate-income geographies, respectively, were significantly below the percentage of the population in those geographies. Examiners considered one branch as near to a low-income CT and provided additional access to the LMI populations in the AA. ONB provided maps and data that detailed they had a branch within a half mile of a low-income CT and that the branch usage by LMI people was near to the percentage of LMI people in the AA.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Louisville MMSA	0	1	0	-1	0	0	0
Total	0	1	0	-1	0	0	0

1/1/2022 – 12/31/2024 Bank Data.

To the extent changes have been made, the institution’s opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as deposit-taking ATMs, online banking and mobile banking. The bank had three deposit-taking ATMs in the AA, of which none were in LMI CTs.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA(s), particularly LMI geographies and/or individuals. Branches in the AA operate during similar hours.

Community Development Services

The institution provided an adequate level of CD services.

During the evaluation period, bank employee contributed a total of 852 hours on 361 instances to organizations supporting LMI individuals and families. This included serving on committees and boards that promote community services, economic development and revitalization/stabilization for LMI communities within AA.

The following are examples of CD services provided in this AA:

- A bank employee provided community service hours to support a nonprofit organization committed to serving low-income and economically challenged individuals. Services consist of fund-raising and board leadership activities. The organization provides financial education, food, and empowerment programs to LMI individuals.
- A bank employee provided community services hours supporting a nonprofit organization that provides financial education, public awareness, mobility training and development support for children with visual impairments in LMI families. The bank employee serves in a technical assistance capacity, previously serving as board president.

Multistate Metropolitan Statistical Area Rating

South Bend MMSA

CRA rating for the South Bend MMSA⁵: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans.
- The bank exhibited a poor borrower distribution of loans.
- The institution was a leader in providing CD loans. CD lending had a significantly positive impact on the Lending Test rating.
- The institution had an excellent level of qualified investments. Bank CD investments were responsive to community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels. The bank made a good level of CD services.

Description of Institution's Operations in South Bend MMSA

ONB's South Bend-Elkhart-Mishawaka, IN-MI MMSA (South Bend MMSA) is comprised of three whole counties: St. Joseph and Elkhart, in Indiana and Berrien County in Michigan. As of the 2020 U.S. Census, the South Bend MMSA contained 181 census tracts, of which 9.4 percent were designated as low-income CTs, 20.9 percent as moderate-income CTs, 39.8 percent were middle-income CTs, 28.2 percent were upper-income CTs, and the remaining 1.7 percent were designated as unknown income CTs. The AA meets the requirement of the regulation and does not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

The populations of the South Bend MMSA as reported through the 2020 U.S. Census was 634,275 of which 6.6 percent were low-income individuals, and 20.7 percent were moderate-income individuals.

As of June 30, 2024, the bank had \$372.8 million in deposits representing 0.9 percent of the bank's total deposits. During the evaluation period, the bank made \$191.4 million or 1.8 percent of its dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated five full-service branches and five deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 19 FDIC-insured institutions

⁵ MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

operating 144 branches in the AA. The bank ranked ninth in deposit market share with 3.0 percent. The top five institutions by market share of the AA are 1st Source Bank, JPMorgan Chase Bank, NA., Lake City Bank, Fifth Third Bank, NA and First State Bank of Middlebury. The top five banks hold a combined 75.9 percent market share. Significant competition for loans exists in the AA.

According to a 2024 Moody's Analytics report, the Elkhart, IN area's strengths include an established Recreational Vehicle (RV) industry and leader in transportation equipment manufacturing, an abundance of specialized factory labor force, low costs of living and doing business, equal distribution of income and wealth and a young population. Weaknesses include an extremely low industrial diversity and high volatility that deter new investment as well as a shortage of well-educated workers. Major employment industries include manufacturing, followed by education and health services, government, and leisure and hospitality services. Major employers include Thor Industries Incl, Forest River Industries, Inc. and Lippert.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the South Bend MMSA ranged from 2.6 to 5.0 percent in January 2022, increasing to 4.4 to 5.6 percent in December 2024. During the same period, the broader Indiana statewide unemployment levels were at 3.4 percent and 4.0 percent and Michigan's statewide unemployment levels were at 5.0 percent during the same evaluation period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulties meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2020 U.S. Census, 10.3 percent of families in the South Bend MMSA are living below the poverty line.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 13.6 percent, with the number of housing units in the AA representing 274,084 at the end of the assessment period. Of that amount, 166,832 are owner-occupied, while 73,046 are occupied rental units, and 34,206 units sit vacant, representing 60.9 percent, 26.6 percent, and 12.5 percent of total housing units, respectively. The median housing value of housing units for the South Bend MMSA was \$139,600 at the end of the assessment period.

The OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Low-income families earned less than \$2,942 within the AA, while moderate-income families earned from \$2,942 to \$4,707 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the evaluation period, the calculated maximum affordable monthly mortgage payment is \$883 for a low-income borrower and \$1,412 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$929. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for a mortgage loan at the median housing value within the AA.

The OCC utilized two community contacts from 2024 for this evaluation. The first contact worked at a community development financial services company and consults with non-profit organizations on fundraising, strategic planning and program development. This contact stated that smaller banks, including credit unions, pay much closer attention to Goshen and Elkhart Counties, than the larger banks

and that there is a significant need for affordable housing. The second community contact worked for an affordable housing organization and stated that tenants were impacted with impaired income during the pandemic and benefited greatly from any hardship programs.

Assessment Area(s) - South Bend-Elkhart-Mishawaka IN-MI MMSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	181	9.3%	20.9%	39.7%	28.1%	1.6%
Population by Geography	634,275	6.5%	20.7%	43.0%	29.0%	0.5%
Housing Units by Geography	274,084	7.0%	21.8%	43.5%	26.9%	0.5%
Owner-Occupied Housing by Geography	166,832	3.9%	16.7%	44.7%	34.2%	0.3%
Occupied Rental Units by Geography	73,046	13.5%	31.6%	40.6%	13.1%	1.0%
Vacant Units by Geography	34,206	8.1%	26.2%	44.1%	20.6%	0.8%
Businesses by Geography	23,186	6.3%	20.4%	43.2%	29.6%	0.4%
Farms by Geography	1,119	3.2%	12.6%	51.5%	32.5%	0.0%
Family Distribution by Income Level	154,596	20.6%	17.7%	21.1%	40.5%	0.0%
Household Distribution by Income Level	239,878	24.0%	16.4%	18.2%	41.2%	0.0%
Unemployment rate (%)	5.0%	12.8%	7.2%	4.1%	3.1%	15.4%
Households Below Poverty Level (%)	13.6%	37.1%	19.3%	11.8%	5.4%	44.5%
Median Family Income (21140 - Elkhart-Goshen, IN MSA)		\$70,610			Median Housing Value	\$139,600
Median Family Income (35660 - Niles, MI MSA)		\$67,533			Median Gross Rent	\$825
Median Family Income (43780 - South Bend-Mishawaka, IN-MI MSA)		\$70,437			Families Below Poverty Level	10.2%
Median Family Income (21140 - Elkhart-Goshen, IN MSA) for 2024		\$82,000				
Median Family Income (35660 - Niles, MI MSA) for 2024		\$85,700				
Median Family Income (43780 - South Bend-Mishawaka, IN-MI MSA) for 2024		\$87,300				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in South Bend MMSA

We did a full-scope review of the South Bend MMSA. When determining conclusions for the Lending Test we gave more weight to the performance of home mortgage loans. We gave more weight to home mortgage lending performance due to the fact that it comprised 66.6 percent of the bank HMDA and small business loan originations. The bank did not originate enough small farm loans to make a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH BEND MMSA

LENDING TEST

The bank’s performance under the Lending Test in the South Bend MMSA is rated High Satisfactory.

Based on a full-scope review, the bank’s performance in the South Bend MMSA was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity									2024
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
South Bend MMSA	488	245	0	9	NA	742	100.0	100.0	
Total	488	245	0	9	NA	742	100.0	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
South Bend MMSA	115,489	75,936	0	45,871	NA	237,296	100.0	100.0	
Total	115,489	75,936	0	45,871	NA	237,296	100.0	100.0	
Source: 1/1/2022 – 12/31/2024 Bank Data.									
Due to rounding, totals may not equal 100.0%									

According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$372.8 million in deposits in the South Bend MMSA. The bank deposits were equivalent to a 3.0 percent deposit market share in the AA. The bank's deposit market share ranked 9th out of 19 deposit taking institutions. The bank's market share ranking was in the top 47.4 percent of all deposit-taking institutions.

According to 2024 peer HMDA data, the bank made 164 mortgage loans totaling \$42.6 million. The bank's HMDA originations were equivalent to 0.9 percent market share of HMDA originations. The bank's market share of HMDA originations was significantly below its deposit market share. The bank's market share of HMDA originations ranked 28th out of 421 home mortgage lenders in the AA. The bank's market share ranking was in the top 8.3 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small business data, the bank made 84 loans totaling \$25.9 million. The bank's small business loan originations were equivalent to a 0.9 percent market share in the AA. The bank's market share of small business loan originations was significantly below its deposit market share. The bank's market share of small business loan originations ranked 15th out of 99 small business lenders. The bank's market share ranking, relative to all lenders, ranked in the top 15.2 percent of all lenders. The bank's market share ranking, relative to all lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table 7 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans in low-income CTs was well below the percentage of owner-occupied housing and was below the

aggregate industry distribution of home mortgage loans to those geographies. The percentage of home mortgages in moderate-income CTs exceeded the percentage of owner-occupied housing units and approximated to the aggregate industry distribution of home mortgage loans in those geographies.

Small Loans to Businesses

Refer to Table 9 in the MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses in low-income CTs was below the percentage of businesses and exceeded the aggregate industry distribution of loans to those geographies. The percentage of small loans to businesses in moderate-income CTs was near to the percentage of businesses and exceeded the aggregate percentage of all reporting lenders.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a poor distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans was poor. When determining our conclusions, examiners considered that low-income borrowers would be challenged to qualify for a home mortgage based on the median home value. Therefore, when evaluating borrower distribution for low-income borrowers we placed more weight on the aggregate comparison. The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and well below the aggregate industry distribution of loans to those borrowers. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and significantly below the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The borrower distribution of small loans to businesses was poor. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was significantly below the percentage of businesses and below the aggregate distribution of small loans to businesses.

Community Development Lending

The institution was a leader in providing CD loans. CD lending had a significantly positive impact on the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made an excellent level of CD loans. During the evaluation period, ONB originated nine CD loans totaling \$45.9 million. This equated to 105.6 percent of allocated tier 1 capital. The bank's CD loans were responsive to economic development and affordable housing, with 44.4 percent of loans supported economic development and 33.3 percent provided affordable housing. The bank's CD loans demonstrated leadership and complexity.

The following are examples of CD loans the bank originated or purchased in the MMSA:

- ONB provided an economic development loan of \$36.8 million to construct an industrial facility in South Bend, Indiana. The primary purpose of the loan is to extend credit to a small business under the SBA North American Industry Classification System size standards. Financing the construction of the industrial facility will support job creation for LMI employees.
- ONB provided a \$1.2 million affordable housing loan for a 20-unit multi-family property. Rents for this development are well below HUD Fair Market Rent for the area, creating naturally occurring affordable housing without reliance on subsidies. While the property is in a middle-income census tract, the project serves the broader community by preserving affordable housing options for LMI households.
- ONB provided three community development loans to finance the construction of an economic development project. The project supported the development of a retail shopping center. The project supports economic development and job creation in communities with significant LMI populations. The project expands access to affordable goods and essential services in LMI neighborhoods, creates employment opportunities for LMI individuals to support workforce development, and stimulates local economic activity while contributing to neighborhood revitalization.

Product Innovation and Flexibility

The institution made use of innovative and/or flexible lending practices in order to serve AA credit needs. See the *Lending in Assessment Area* section for details on loan programs.

The Illinois Housing Development Authority (IHDA) offers IHDA Mortgage. The program helps LMI families buy existing or newly built homes within county city limits by offering down payment and closing cost assistance. During the evaluation period, the bank originated 90 loans totaling \$16.1 million. Additionally, the bank made four 4 loans for \$42.1 million through SBA loan programs.

INVESTMENT TEST

The institution’s performance under the Investment Test in South Bend MMSA is Outstanding.

Based on a full-scope review, the institution’s performance in the South Bend MMSA was excellent.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
South Bend MMSA	15	3,789	74	6,423	89	100.0	10,212	100.0	0	0
Total	15	3,789	74	6,423	89	100.0	10,212	100.0	0	0

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. In total the bank had 89 qualified investments totaling \$10.2 million. The dollar volume of current and prior period investments was equivalent to 23.3 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume, 46.9 percent of investments supported affordable housing, 31.4 percent supported community services, 19.6 percent promoted economic development, and 2.1 percent funded revitalization and stabilization efforts. The following are examples of qualified investments in the AA:

- The bank made 11 investments in MBS totaling \$3.6 million. These investments supported affordable housing in the AA.
- A \$15,000 grant to support an affordable housing organization that builds houses for LMI families. This grant helped support a project to build new single-family homes for LMI people in the AA.
- A \$10,000 grant to an organization providing community services to LMI families. The grant supported a literacy program and tutoring services for LMI students.

SERVICE TEST

The institution’s performance under the Service Test in South Bend MMSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the South Bend MMSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’s AA.

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits		Branches						Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
South Bend MMSA	100.0	5	100.0	0	40.0	40.0	20.0	0	6.6	20.7	43.1	29.1	0.5
Total	100.0	5	100.0	0	40.0	40.0	20.0	0	6.6	20.7	43.1	29.1	0.5

*Source: FFIEC File – 2020 U.S. Census
12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%*

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’s AA. When determining our conclusions we gave more weight to performance of moderate-income geographies. We gave more weight to moderate-income geographies due to the relatively low number of branches and the small overall percentage of the population in low-income CTs. The bank did not have any branches in low-income geographies. The proportion of branches in low-income CT is significantly below the percentage of the population in those geographies. The proportion of retail bank branches in moderate-income geographies exceeded the percentage of the population in those geographies.

The bank did not open or close any branches throughout the evaluation period.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as deposit-taking ATMs, online banking and mobile banking. The bank had five deposit-taking ATMs in the AA, of which two were in moderate-income CTs.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly LMI geographies and/or individuals. Branches operate during similar hours.

Community Development Services

The institution provided a good level of CD services.

Bank employees contributed a total of 476 hours on 63 instances providing support to organizations supporting LMI individuals and families. This included serving on committees and boards that promote community services and economic development for LMI communities within the MMSA.

The following are examples of CD services provided in this AA:

- Bank employees provided community service hours as a board or committee members to an organization for women and children experiencing economic poverty and homelessness. The organization provides a safe environment where individuals can receive essential services such as meals, clothing, showers, and case management.
- A bank employee provided community service hours to an organization that provides temporary shelter, and support services such as meals, clothing and counseling to LMI individuals transitioning out of homelessness.

State Rating

State of Illinois

CRA rating for the State of Illinois⁶: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AAs credit needs.
- The bank exhibited an adequate geographic distribution of loans.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- The institution made an adequate level of CD loans.
- The institution made an adequate level of CD investments.
- The bank's retail delivery systems are reasonably accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Illinois

ONB had three AAs in the state of Illinois: Champaign-Urbana, IL MSA (Champaign MSA), Danville, IL MSA (Danville MSA), and Illinois Non-MSA. The Illinois Non-MSA received a full scope review. For the Illinois Non-MSA, all counties were combined and analyzed as one AA. The remaining assessment areas received limited-scope reviews. The AAs meet the requirements of the regulation and do not arbitrarily exclude LMI CTs. The bank's operations in Illinois comprised 1.2 percent of total bank deposits.

Illinois Non-MSA

The Illinois Non-MSA consisted of Knox, LaSalle, and Vermillion (2024 only) counties . As of the 2020 U.S. Census, the Illinois Non-MSA contained 68 census tracts, of which 5.9 percent were designated as low-income CTs, 10.3 percent were designated as moderate-income CTs, 67.7 percent were middle-income CTs, 13.2 percent were upper-income CTs, and the remaining 2.9 percent were designated as

⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

unknown income CTs. The AA meets the requirements of the regulations and does not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

The population of the Illinois Non-MSA as reported through the 2020 U.S. Census was 233,813 of which 3.8 percent were low-income individuals, and 9.0 percent were moderate-income individuals.

As of June 30, 2024, the bank had \$451.5 million in deposits representing 1.1 percent of the bank's total deposits. During the evaluation period, the bank made \$49.4 million or 16.0 percent of its dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated four full-service branches and three deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 43 FDIC-insured institutions operating 92 branches in the AA. The bank ranked fourth in deposit market share with 6.2 percent. The remaining institutions in the top five by market share in the AA are Wells Fargo Bank, N.A., American Commercial Bank & Trust, N.A., First State Bank and Iroquois Federal Savings and Loan Association. The top five banks hold a combined 46.7 percent market share. Significant competition for loans exists in the AA.

The poverty level across the AA was considered in the evaluation of lending performance. In total, 14.8 percent of households are living below the stated poverty rate, and would have difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2024 U.S. Census, 11.5 percent of families in the Illinois Non-MSA had income below the federal poverty line.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 14.8 percent, with the number of housing units in the AA representing 110,045 million at the end of the evaluation period. Of that amount, 68,153 million are owner-occupied, while 28,377 million are occupied rental units, and 13,515 units are vacant, representing 61.9 percent, 25.8 percent, and 12.3 percent of total housing units, respectively. The median housing value of housing units for the Illinois Non-MSA was \$95,500 at the end of the evaluation period.

Examiners utilized one community contact within the Illinois Non-MSA footprint. The contact is from a municipal agency whose job it is to connect LMI people to needed community services. The contact indicated there is an active manufacturing sector and there is a need for affordable housing for workers. There is also a need for Tax Increment Financing to support infrastructure projects.

Assessment Area(s) - Illinois Non-MSA 2024						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	68	5.88	10.29	67.65	13.24	2.94
Population by Geography	233,813	3.76	9.00	70.40	15.24	1.61
Housing Units by Geography	110,045	4.36	9.46	70.02	14.43	1.73
Owner-Occupied Housing by Geography	68,153	2.52	6.99	73.05	16.78	0.65
Occupied Rental Units by Geography	28,377	7.00	13.31	66.88	9.02	3.80
Vacant Units by Geography	13,515	8.09	13.81	61.33	13.94	2.83
Businesses by Geography	6,427	5.45	11.37	64.45	15.59	3.14
Farms by Geography	634	0.63	3.79	73.82	21.77	0.00
Family Distribution by Income Level	59,805	21.47	16.79	21.49	40.25	0.00
Household Distribution by Income Level	96,530	24.55	16.92	16.93	41.60	0.00
Unemployment rate (%)	5.79	11.00	8.90	5.20	5.14	11.48
Households Below Poverty Level (%)	14.84	42.91	24.50	13.33	7.34	29.53
Median Family Income (Non-MSAs - IL)		\$67,835			Median Housing Value	\$95,500
Median Family Income (Non-MSAs - IL) for 2024		\$82,800			Median Gross Rent	\$716
					Families Below Poverty Level	11.48
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Illinois Non-MSA 2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	0.00	11.36	72.73	13.64	2.27
Population by Geography	159,625	0.00	6.75	75.52	16.23	1.50
Housing Units by Geography	74,010	0.00	7.74	75.67	15.03	1.55
Owner-Occupied Housing by Geography	46,185	0.00	5.12	76.41	18.31	0.16
Occupied Rental Units by Geography	19,328	0.00	12.13	76.11	7.37	4.39
Vacant Units by Geography	8,493	0.00	12.03	70.71	14.64	2.63
Businesses by Geography	4,612	0.00	11.71	68.28	16.37	3.64
Farms by Geography	444	0.00	3.15	70.95	25.90	0.00
Family Distribution by Income Level	40,764	19.54	16.25	22.51	41.71	0.00
Household Distribution by Income Level	65,517	23.80	16.75	16.72	42.74	0.00
Unemployment rate (%)	5.77	0.00	8.26	5.62	5.05	9.44
Households Below Poverty Level (%)	13.87	0.00	25.52	13.85	6.62	33.12
Median Family Income (Non-MSAs - IL)		\$68,958			Median Housing Value	\$110,200
Median Family Income (Non-MSAs - IL) for 2023		\$82,300			Median Gross Rent	\$756
					Families Below Poverty Level	9.99
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Illinois

We did a full-scope review on the Illinois Non-MSA, all other AAs are reviewed as limited-scope AAs. Examiners considered the Illinois Non-MSA as full-scope AA, due to the facts this AA had 92.1 percent of the bank’s deposits, and 67.0 percent of all HMDA, small business, and small farm loan originations in the state of Illinois.

When determining our conclusions for the Lending Test geographical and borrower distribution, we gave more weight to HMDA and small farm performance due to the fact they represent 48.4 percent and 42.1 percent of all HMDA, small business, and small farm loans, respectively. The bank did not originate enough small loans to businesses in 2024 to conduct a meaningful analysis. Therefore, all weight for geographical and borrower distribution of small loans to businesses was placed on performance in 2022-2023.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Illinois Non-MSA was adequate.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								2024	
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Champaign MSA	106	31	28	0	NA	165	26.7	4.9	
Danville MSA	80	25	16	2	NA	123	19.6	38.0	
Illinois Non-MSA	162	32	141	1	NA	336	53.7	57.1	
Total	348	88	185	3	NA	624	100.0	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Champaign MSA	69,616	6,273	4,837	0	NA	80,726	26.2	4.9	
Danville MSA	5,907	5,475	2,568	164,616	NA	178,566	57.8	38.0	
Illinois Non-MSA	15,151	6,399	24,846	3,000	NA	49,396	16.0	57.1	
Total	90,674	18,147	32,251	167,616	NA	308,688	100.0	100.0	
Source: 1/1/2022 – 12/31/2024 Bank Data.									
Due to rounding, totals may not equal 100.0%									

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$451.5 million in deposits in the Illinois Non-MSA. The bank deposits were equivalent to a 6.2 percent deposit market share in the AA. The bank's deposit market share ranked fourth out of 43 deposit taking institutions. The bank's market share ranking was in the top 9.3 percent.

According to 2024 peer HMDA data, the bank made 69 mortgage loans totaling \$6.7 million. The bank's HMDA originations were equivalent to 1.8 percent market share of HMDA originations. The bank's market share of HMDA originations was significantly below its deposit market share. The bank's market share of HMDA originations ranked 17th out of 262 home mortgage lenders in the AA. The bank's market share ranked in the top 6.5 percent of all HMDA lenders. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small business data, the bank made 202 loans totaling \$29.8 million. The bank's small business loan originations were equivalent to 3.6 percent market share in the AA. The bank's market share of small business loan originations was well below its deposit market share. The bank's market share of small business originations ranked eighth out of 86 small business lenders. The bank market share ranking, relative to all lenders, ranked in the top 9.3 percent of all lenders. The bank's market share ranking, relative to all lenders, was consistent with its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small farm data, the bank made 42 loans totaling \$7.3 million. The bank's small farm loan originations were equivalent to 16.1 percent market share in the AA. The bank's market share of small farm loan originations exceeds its deposit market share. The bank's market share of small farm loan originations ranked third out of 13 small farm lenders. The bank's market share ranking, relative to all lenders, ranked in the top 23.1 percent of all lenders. The bank's market share ranking, relative to all lenders, was weaker than its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table 7 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Illinois Non-MSA

The geographical distribution of home mortgage loans was excellent. For 2022 through 2023, there were no low-income CTs in the Illinois Non-MSA, therefore we placed all weight on moderate-income geographical distribution performance. The proportion of the bank's home mortgage loans in moderate-income CTs exceeded both the percentage of owner-occupied housing and aggregate industry distribution of loans to those geographies. Performance in 2024 was consistent with performance in 2022 through 2023. For 2024, the proportion of the bank's home mortgage loans in low-income CTs exceeded the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies. The proportion of the bank's home mortgage loans to moderate-income CTs exceed the percentage of owner-occupied housing and approximated the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

Refer to Table 9 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Illinois Non-MSA

The geographical distribution of small loans to businesses was excellent. For 2022 through 2023, there were no low-income CTs in the Illinois Non-MSA, therefore we placed all weight on moderate-income geographical distribution performance. The proportion of the bank's small loans to businesses in moderate-income CTs exceeded both the percentage of businesses and the aggregate industry distribution of loans to those geographies.

Small Loans to Farms

Refer to Table 11 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Illinois Non-MSA

The geographical distribution of small loans to farms was very poor. The bank did not originate any loans in LMI CTs 2022 through 2023, and 2024.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Illinois Non-MSA

The borrower distribution of home mortgage loans was adequate. For 2022 through 2023, the proportion of the bank's home mortgage loans to low-income borrowers was well below the percentage of low-income families and below the aggregate industry distribution of loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and well below the aggregate industry distribution of loans to those families. In 2024, bank performance was stronger than performance 2022 through 2023. Stronger performance was due to a higher proportion of bank loans as compared to the percentage of LMI families and the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Illinois Non-MSA

The borrower distribution of small loans to businesses was adequate. For 2022 through 2023, the proportion of bank loans to businesses with revenues less than \$1 million was well below the percentage of businesses and below the aggregate industry distribution of loans to those businesses.

Small Loans to Farms

Refer to Table 12 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Illinois Non-MSA

The borrower distribution of small loans to farms was excellent. The proportion of bank loans to farms with revenues less than \$1 million was below the percentage of small farms and exceeded the aggregate industry distribution of loans to those farms. Performance in 2024 was consistent with performance 2022 through 2023.

Community Development Lending

The institution made an adequate level of CD loans.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Illinois Non-MSA

The institution had made an adequate level of CD loans. During the evaluation period, ONB originated one CD loan totaling \$3.0 million. This equated to 5.7 percent of allocated tier 1 capital. The bank loan supported revitalization and stabilization in the Illinois Non-MSA.

The following is an example of a CD loan made during the evaluation period:

- ONB provided one loan totaling \$3 million to renew a working capital line of credit for a welding and machining company. The property was located in an Enterprise Zone and part of the Galesburg Economic Development District.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. See the *Lending in Assessment Area* section for details on loan programs and loan volumes.

The Illinois Housing Development Authority (IHDA) offers IHDA Mortgage. The program helps LMI families buy existing or newly built homes within county city limits by offering down payment and closing cost assistance. During the evaluation period, the bank originated 90 IHDA loans totaling \$16.1 million.

Conclusions for Area Receiving a Limited-Scope Review

Refer to Tables 7 through 14 in the state of Illinois section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Champaign MSA was consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance in the Danville MSA was stronger than its performance in the full-scope AA. Stronger performance was due to a higher percentage of loans as compared to the demographic and aggregate for both HMDA small business geographical and borrower distribution. Performance in the limited-scope AAs supported the overall Lending Test conclusion.

INVESTMENT TEST

The bank's performance under the Investment Test in Illinois is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Illinois Non-MSA was adequate.

The institution exhibited adequate responsiveness to credit and community development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Champaign MSA	23	2,008	20	1,145	43	31.4	3,153	35.4	0	0
Danville MSA	11	2,987	19	358	30	21.9	3,345	37.6	0	0
Illinois Non-MSA	17	933	47	1,470	64	46.7	2,403	27.0	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	51	5,928	86	2,973	137	100.0	8,901	100.0	0	0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Illinois Non-MSA

The institution had an adequate level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. In total, the bank had 64 qualified investments totaling \$2.4 million. The dollar volume of current and prior period investments represented 4.3 percent of allocated tier 1 capital. The institution exhibited good responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Champaign MSA was consistent with the bank's overall performance under the Investment Test in the full-scope

areas. Based on a limited-scope review, the bank’s performance under the Investment Test in the Danville MSA was stronger than the bank’s overall performance under the Investment Test in the full-scope areas. Stronger performance was due to a higher percentage of CD investments as compared to allocated tier 1 capital. Performance in the limited-scope AAs supported the overall Investment Test rating in Illinois.

SERVICE TEST

The bank’s performance under the Service Test in Illinois is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Illinois Non-MSA was good.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution’s AA.

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits		Branches					Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Champaign MSA	4.9	1	14.3	0.0	0.0	0.0	100.0	0.0	3.8	9.0	70.4	15.2	1.6
Danville MSA	38.0	2	28.6	0.0	50.0	0.0	50.0	0.0	8.9	10.1	51.1	28.1	1.8
Illinois Non-MSA	57.1	4	57.1	25.0	0.0	50.0	0.0	25.0	12.0	18.5	25.1	37.1	7.3
Total	100.0	7	100.0										

Source: FFIEC File - 2020 U.S. Census
1/1/2022 – 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Illinois Non-MSA

The proportion of bank branches in low-income CTs exceeded the percentage of the population and was significantly below the percentage of the population in moderate income CTs.

Table 6: Distribution of Branch Openings/Closings							
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)				
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp	NA
Champaign MSA							
Danville							
Illinois Non-MSA		1			-1		
Total							

1/1/2022 – 12/31/2024 Bank Data.

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution’s opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as deposit-taking ATMs, online banking and mobile banking. The bank had four deposit-taking ATMs in the AA, of which one was in a low-income CT and one was in a moderate-income CT. Examiners considered these services, as the bank provided supporting data to determine the impact on, or usage by, LMI individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals .

Community Development Services

The institution provided an adequate level of CD services. In total the bank provided 207 hours of community service in 47 instances. The bank was proactive in providing board services, which demonstrated leadership. The bank's CD service hour were responsive to community service with 67.3 percent of all hours.

The following are some examples of CD service:

- The bank provided 100 hours of community service to an institution that provides various needed services for LMI people throughout the AA. Bank participation included board service hours.
- The bank provided 11 hours of community service to a municipal housing agency. The bank employees provided their expertise and worked with LMI people to enhance financial literacy.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Champaign MSA was weaker than the bank's overall performance under the Service Test in the full-scope area. Weaker performance was due to no LMI branches. Based on a limited-scope review, the bank's performance under the Service Test in the Danville MSA was consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Indiana

CRA rating for the State of Indiana⁷: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness.
- The bank exhibited an excellent geographic distribution of its loans.
- The bank exhibited good distribution of loans among individuals of different income levels and business and farms of different sizes.
- The institution was a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.
- The bank made extensive use of innovative and flexible products. Innovative and flexible lending had a positive impact on the Lending Test rating.
- The institution had an excellent level of qualified investments, including grants.
- Service delivery systems were readily accessible to geographies and individuals of different income levels. Openings and closing of branches expanded access to LMI CTs. The bank was a leader in providing CD services.

Description of Institution's Operations in Indiana

ONB had seven AAs in the state of Indiana: Bloomington-Bedford, IN MSA (Bloomington MSA), Evansville-Henderson, IN-KY MSA (2024) (Evansville MSA), Fort Wayne -Huntington-Auburn, IN MSA (Fort Wayne MSA), Indianapolis-Carmel-Muncie CSA (Indianapolis CSA), Lafayette-West Lafayette, IN MSA (Lafayette MSA), Terre Haute MSA, and Indiana Non-MSA. For the Indiana Non-MSA, all Non-MSA counties were combined and analyzed as one AA. The Evansville MSA and Indianapolis CSA received full-scope reviews. The remaining AAs received limited-scope reviews. The bank's operations in Indiana comprised 27.6 percent of total bank deposits. The AAs meet the requirements of the regulation and do not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

Evansville MSA

⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The Evansville MSA consisted of three whole counties: Posey, Vanderburgh and Warrick. As of the 2020 U.S. Census, the Evansville MSA contained 82 census tracts, of which 13.4 percent were designated as low-income CTs, 20.7 percent were designated as moderate-income CTs, 36.6 percent were middle-income CTs, 22.0 percent were upper-income CTs, and the remaining 7.3 percent were designated as unknown income CTs. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI CTs.

The populations of the Evansville MSA as reported through the 2020 U.S. Census was 269,256 of which 9.7 percent were low-income individuals, and 20.1 percent were moderate-income individuals.

As of June 30, 2024, the bank had \$4.2 billion in deposits in the Evansville MSA, representing 10.5 percent of the bank's total deposits. In 2024, the bank made \$83.5 million or 10.7 percent of its total dollar volume of HMDA and CRA small business and small farm loan originations within Indiana.

The bank operated 12 full-service branches and 18 deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 15 FDIC-insured institutions operating 70 branches in the AA. The bank ranked first in deposit market share with 35.5 percent. The other top five competitors by deposit market share are United Fidelity Bank, FSB, Fifth Third Bank, N.A., German American Bank, and First Federal Savings Bank. The top five banks hold a combined 91.6 percent of market share.

According to a 2024 Moody's Analytics report the Evansville, IN area's strengths include healthcare attracting patients from surrounding rural counties, high value-added manufacturing base and low business costs. Weaknesses include below-average share of working-age adults, dearth of high-wage jobs and low quality of life metrics. Major employment industries include education and health services, manufacturing, professional and business services, leisure and hospitality services and retail trade activities. Major employers include Deaconess Hospital, Toyota Motor Manufacturing Indiana Inc, Ascension St. Vincent Health System, Berry Global and University of Southern Indiana.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Evansville MSA ranged from 2.8 to 4.1 percent in January 2022, increasing to 3.2 to 5.0 percent in December 2024. During the same period, the broader Indiana statewide unemployment levels were at 3.4 percent and 4.0 percent during the same evaluation period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2024 U.S. Census, 8.8 percent of families in the Evansville MSA had income below the federal poverty line.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 12.8 percent, with the number of housing units in the AA representing 122,339 at the end of the evaluation period. Of that amount, 77,717 are owner-occupied, while 33,345 are occupied rental units, and 11,277 units sit vacant, representing 63.5 percent, 27.3 percent, and 9.2 percent of total housing units, respectively. The median housing value of housing units for the Evansville MSA was \$127,350 at the end of the evaluation period.

The OCC evaluated the difference between the median income of families within the AA and the cost of housing. Low-income families earned less than \$3,675 within the AA, while moderate-income

families earned from \$3,675 to \$5,880 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant’s income. For the evaluation period, the calculated maximum affordable monthly mortgage payment was \$1,103 for a low-income borrower and \$1,764 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$847. Based on these calculations, some low-income and all moderate-income borrowers would be able to qualify for a mortgage loan at the median housing value within the AA.

We utilized two community contacts for this evaluation period, conducted in 2023 and 2024, with organizations located throughout the AA. The organizations focused on economic development and affordable housing. The first contact noted that while a new solar project development program and an assembly plant employed nearly 12,000 people, both were having difficulty finding new employees. The second contact noted that while housing stock increased, it is still less than what it was the last 15 years, and buyers are disheartened by increasing interest rates.

Evansville MSA

Assessment Area(s) - Evansville MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	82	13.41	20.73	36.59	21.99	7.32
Population by Geography	269,256	9.67	20.07	39.12	30.99	0.15
Housing Units by Geography	122,339	11.54	21.77	39.92	26.36	0.43
Owner-Occupied Housing by Geography	77,717	6.35	17.20	43.64	32.59	0.22
Occupied Rental Units by Geography	33,345	19.61	30.58	34.10	15.18	0.54
Vacant Units by Geography	11,277	23.47	27.20	31.43	16.49	1.43
Businesses by Geography	9,863	9.37	19.87	33.89	29.47	7.39
Farms by Geography	545	3.49	9.17	52.48	34.11	0.73
Family Distribution by Income Level	71,053	21.35	18.06	21.23	39.33	0.00
Household Distribution by Income Level	111,062	23.15	16.90	17.54	42.41	0.00
Unemployment rate (%)	4.53	11.66	4.87	4.46	2.26	12.57
Households Below Poverty Level (%)	12.80	29.08	16.71	11.53	5.51	8.07
Median Family Income (21780 - Evansville, IN MSA)		\$75,099		Median Housing Value		\$127,350
Median Family Income (21780 - Evansville, IN MSA) for 2024		\$88,200		Median Gross Rent		\$791
				Families Below Poverty Level		8.82
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Indianapolis CSA

The Indianapolis CSA is comprised of eight whole counties: Bartholomew, Boone, Delaware, Hamilton, Hendricks, Johnson, Madison, and Marion. As of the 2020 U.S. Census, the Indianapolis CSA contained 469 census tracts, of which 12.4 percent were designated as low-income CTs, 24.3 percent were designated as moderate-income CTs, 35.4 percent were middle-income CTs, 25.6 percent were upper-income CTs, and the remaining 2.3 percent were designated as unknown income CTs.

The populations of the Indianapolis CSA as reported through the 2020 U.S. Census was 2,056,275 of which 8.3 percent were low-income individuals, and 20.8 percent were moderate-income individuals.

As of June 30, 2024, the bank had \$2.5 billion in deposits in the Indianapolis CSA, representing 6.3 percent of the bank's total deposits. During the evaluation period, the bank made \$1.0 billion or 10.2 percent of its total dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated 26 full-service branches and 26 deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 43 FDIC-insured institutions operating 471 branches in the AA. The bank ranked 12th in deposit market share with 2.9 percent. The top five competitors by deposit market share are JPMorgan Chase Bank NA., Merchants Bank of Indiana, PNC Bank, NA., Fifth Third Bank, NA., and The Huntington National Bank. The top five banks hold a combined 57.8 percent of market share.

According to 2024 Moody's Analytics report, the Indianapolis-Carmel- Greenwood area's strengths include strategic location for logistics, burgeoning pharmaceutical industry, low business and living costs compared with other large metro areas, and the state government provides stability. Weaknesses include low quality of life due to pollution and high crime rates. Major employment industries include leisure and hospitality services, education and health services, construction, and financial activities. Major employers include Indiana University Health, St. Vincent Hospitals & Health Services, Community Health Network and Eli Lilly & Co.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Indianapolis CSA ranged from 2.1 to 3.9 percent in January 2022, increasing to 3.4 to 4.6 percent in December 2024. During the same period, the broader Indiana statewide unemployment levels were at 3.4 percent and 4.0 percent during the same evaluation period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2024 U.S. Census, 8.5 percent of families in the Indianapolis CSA had income below the federal poverty line.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 12.2 percent, with the number of housing units in the AA representing 852,724 at the end of the evaluation period. Of that amount, 498,177 are owner-occupied, while 276,265 are occupied rental units, and 78,282 units sit vacant, representing 58.4 percent, 32.4 percent, and 9.2 percent of total housing units, respectively. The median housing value of housing units for the Indianapolis CSA was \$144,400 at the end of the evaluation period.

The OCC evaluated the difference between the median income of families within the AA and the cost of housing. Low-income families earned less than \$4,108 within the AA, while moderate-income families earned from \$4,108 to \$6,573 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the evaluation period, the calculated maximum affordable monthly mortgage payment was \$1,233 for a low-income borrower and \$1,972 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly

mortgage payment for a home in the AA using the median housing value would be \$961. Based on these calculations, some low-income and all moderate-income borrowers would be able to qualify for a mortgage loan at the median housing value within the AA.

The OCC utilized two community contacts from 2023 for this evaluation. The organizations contacted focused on areas such as affordable housing and economic development. The first contact said the primary purpose of the organization is to make homeownership attainable for working-class individuals by providing downpayment assistance, educational workshops, and coaching. The contact noted that housing inventory in Indianapolis is low, prices are high, and lenders are becoming more restrictive. The second contact helped small businesses start, grow, finance, innovate, and transition through no-cost, confidential business advising and training. The contact noted that the underwriting process for start-up business lending is longer, and some banks have stopped lending. Small business lending generally became more restricted as banks become more risk averse, although the overall economy remains strong. As a result of these dynamics, many small businesses and entrepreneurs continue to struggle to obtain financing. Both contacts noted that there are opportunities to provide affordable housing through home ownership. There are also opportunities for local banks to be more supportive in establishing or expanding community-based lending.

Indianapolis CSA

Assessment Area(s) - Indianapolis CSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	469	12.37	24.31	35.39	25.55	2.35
Population by Geography	2,056,275	8.25	20.76	37.36	31.84	1.75
Housing Units by Geography	852,724	9.69	22.30	37.48	29.04	1.50
Owner-Occupied Housing by Geography	498,177	4.86	15.90	40.88	37.38	0.98
Occupied Rental Units by Geography	276,265	15.35	31.44	32.97	17.95	2.30
Vacant Units by Geography	78,282	20.48	30.75	31.74	15.07	1.96
Businesses by Geography	93,897	7.38	18.93	35.94	34.63	3.12
Farms by Geography	3,378	6.04	15.69	46.12	30.97	1.18
Family Distribution by Income Level	485,715	20.86	17.49	20.41	41.23	0.00
Household Distribution by Income Level	774,442	23.81	16.49	18.20	41.50	0.00
Unemployment rate (%)	4.74	9.55	6.69	4.17	2.91	10.18
Households Below Poverty Level (%)	12.15	29.85	18.40	9.74	5.09	25.84
Median Family Income (18020 - Columbus, IN MSA)		\$79,194		Median Housing Value		\$144,400
Median Family Income (26900 - Indianapolis-Carmel-Greenwood, IN MSA)		\$80,333		Median Gross Rent		\$912
Median Family Income (34620 - Muncie, IN MSA)		\$61,415		Families Below Poverty Level		8.50
Median Family Income (18020 - Columbus, IN MSA) for 2024		\$93,600				
Median Family Income (26900 - Indianapolis-Carmel-Greenwood, IN MSA) for 2024		\$98,600				
Median Family Income (34620 - Muncie, IN MSA) for 2024		\$73,400				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Indiana

We conducted a full-scope review for the Evansville MSA and Indianapolis CSA. Examiners considered the fact that these AAs accounted for 37.9 and 22.8 percent of statewide deposits, respectively. Additionally, the Evansville MSA is where the bank has its headquarters. Due to OMB changes the Evansville MSA is only part of the Indiana rating area in 2024.

For the Lending Test, in the Evansville MSA, 2024 peer small business aggregate data was not available at the time of the evaluation, therefore conclusions for small business geographical and borrower distribution are based solely on performance compared to the demographic. Additionally, there was no data to be compare bank small business lending to its peers, thus lending activity for small business loans was not included in this evaluation. The bank did not make enough small loans to farms in the Indianapolis CSA and Evansville MSA in 2024 and the Terre Haute MSA 2022 through 2024 to conduct a meaningful geographical and borrower distribution analysis.

Due to 2024 OMB changes Putnam County was removed from the Indianapolis CSA and included in the Indiana Non-MSA. The OMB change results in the Indianapolis CSA having two analysis periods for the Lending Test, 2022-2023 and 2024.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

The bank’s performance under the Lending Test in Indiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Indianapolis CSA was excellent. Based on full-scope reviews, the bank’s performance in the Evansville MSA was good.

Lending Activity

Lending levels reflected good responsiveness to AAs credit needs.

Table 3: Lending Activity									2022-2024
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Bloomington MSA	490	211	2	3	NA	706	7.1	7.5	
Evansville MSA	393	440	7	9	NA	849	8.5	37.9	
Fort Wayne MSA	370	234	0	9	NA	613	6.1	4.5	
Indiana Non-MSA	1,132	638	531	4	NA	2,305	23.1	18.8	
Indianapolis CSA	2,908	1,314	35	49	NA	4,306	43.2	22.8	
Lafayette MSA	438	122	4	3	NA	567	5.7	2.8	
Terra Haute MSA	422	196	11	0	NA	629	6.3	5.7	
Broader Regional	0	0	0	2	NA	2	0.0	0.0	
Total	6,153	3,155	590	79	NA	9,977	100.0	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Bloomington MSA	99,274	46,151	569	6,000	NA	151,994	6.7	7.5	
Evansville MSA	83,527	94,953	1,562	50,143	NA	230,185	10.1	37.9	
Fort Wayne MSA	83,581	54,878	0	19,818	NA	158,277	6.9	4.5	
Indiana Non-MSA	142,320	97,101	81,198	11,096	NA	331,715	14.5	18.8	

Indianapolis CSA	763,159	289,295	5,342	116,536	NA	1,174,332	51.5	22.8
Lafayette MSA	86,200	25,677	354	20,914	NA	133,145	5.9	2.8
Terra Haute MSA	56,254	32,487	975	0	NA	89,716	3.9	5.7
Broader Regional	0	0	0	11,500	NA	11,500	0.5	0.0
Total	1,314,315	640,542	90,000	236,007	NA	2,280,864	100.0	100.0

Source: 1/1/2022 – 12/31/2024 Bank Data.

Due to rounding, totals may not equal 100.0%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Evansville MSA

Lending levels reflected good responsiveness to AA credit needs. According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$4.2 billion in deposits in the Evansville MSA. The bank's deposits were equivalent to a 35.5 percent deposit market share in the AA. The bank's deposit market share ranked first out of 15 deposit taking institutions. The bank's market share ranking was in the top 6.7 percent.

According to 2024 HMDA data, the bank made 393 mortgage loans totaling \$84.1 million. The bank's HMDA originations were equivalent to 5.2 percent market share of HMDA originations. The bank's market share of HMDA originations was significantly below its deposit market share. The bank's market share of HMDA originations ranked fifth out of 271 home mortgage lenders in the AA. The bank's market share ranking was in the top 1.8 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was equivalent to its deposit market share ranking, relative to all deposit taking institutions.

Indianapolis CSA

Lending levels reflected good responsiveness to AA credit needs. According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$2.5 billion in deposits in the Indianapolis CSA. The bank's deposits were equivalent to a 2.9 percent deposit market share in the AA. The bank's deposit market share ranked 12th out of 43 deposit taking institutions. The bank's market share ranking was in the top 27.9 percent.

According to 2024 peer HMDA data, the bank made 881 mortgage loans totaling \$185.6 million. The bank's HMDA originations were equivalent to 1.3 percent market share of HMDA originations. The bank's market share of HMDA originations was significantly below its deposit market share. The bank's market share of HMDA originations ranked 23rd out of 634 home mortgage lenders in the AA. The bank's market share ranking was in the top 3.6 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small business data, the bank made 439 loans totaling \$93.7 million. The bank's small business loan originations were equivalent to 1.0 percent market share in the AA. The bank's market share of small business loan originations was significantly below its deposit market share. The bank's market share of small business loan originations ranked 15th out of 156 small business lenders. The bank's market share ranking, relative to all lenders, ranked in the top 9.6 percent of all lenders. The bank's market share ranking, relative to all lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table 7 in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Evansville MSA

The geographical distribution of home mortgage loans was adequate. The proportion of the bank's home mortgage loans in low-income CTs was below the percentage of owner-occupied housing and near to the aggregate industry distribution of home mortgage loans to those geographies. The proportion of the bank's home mortgage loans to moderate-income CTs was below both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Indianapolis CSA

The geographical distribution of home mortgage loans was excellent. For 2022 through 2023, the proportion of bank home mortgage loans to low-income CTs exceeded the percentage of owner-occupied housing and approximated the aggregate industry distribution of loans to those geographies. The proportion of the bank's home mortgage loans to moderate-income CTs was near to both the percentage of owner-occupied housing and the aggregate industry distribution to those geographies. For 2024, performance was stronger than performance 2022 through 2023. Stronger performance was due to exceeding the proportion of the bank's home mortgage loans in LMI CTs for both the percentage owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

Refer to Table 9 in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Evansville MSA

The geographical distribution of small loans to businesses was good. The proportion of bank loans in low-income CTs exceeded the percentage of businesses in those geographies. The proportion of bank loans in moderate-income geographies was below the percentage of businesses in those geographies.

Indianapolis CSA

The geographical distribution of small loans to businesses was good. For 2022 through 2023, the proportion of the bank's small loans to businesses to low-income CTs was near to the percentage of businesses and exceeded the aggregate industry distribution of loans to those geographies. The proportion of loans to moderate-income CTs was below the percentage of businesses and was near to the aggregate industry distribution of loans to those geographies. Performance in 2024 was stronger than performance in 2022 through 2023. Stronger performance is due to a higher proportion of bank loans as compared to the percentage of businesses in those geographies.

Small Loans to Farms

Refer to Table 11 in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Indianapolis CSA

The geographical distribution of small loans to farms was good. For 2022 through 2023, we considered the low number of small farms in low-income geographies, therefore we placed more weight on performance in moderate-income geographies. The bank did not make any loans in low-income geographies. The proportion of bank small loans to farms was below the percentage of farms and exceeded the aggregate industry distribution of loans to those geographies.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Evansville MSA

The borrower distribution of home mortgage loans was good. For 2024, the proportion of the bank's home mortgage loans to low-income borrowers was significantly below the percentage of families and approximated the aggregate industry distribution of loans to those families. The proportion of the bank's loans to moderate-income borrowers was near to the percentage of families and was below the aggregate industry distribution of loans to those borrowers.

Indianapolis CSA

The borrower distribution of home mortgage loans was good. For 2022 through 2023, the proportion of the bank's home mortgage loans to low-income borrowers was significantly below the percentage of families and near to the aggregate industry distribution of loans of those families. The proportion of loans to moderate-income borrowers approximated the percentage of families and was below the aggregate industry distribution of loans to those families. For 2024, bank performance was stronger than performance 2022 through 2023. Stronger performance was due to the proportion of bank loans exceeding the industry aggregate to low-income borrowers and exceeding both the percentage of moderate-income families and the aggregate industry distribution of loans to moderate-income families.

Small Loans to Businesses

Refer to Table 10 in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Evansville MSA

The borrower distribution of small loans to businesses was very poor. The proportion of bank loans to businesses with revenues less than \$1.0 million was significantly below the percentage of businesses.

Indianapolis CSA

The borrower distribution of small loans to businesses was adequate. When determining the conclusion, examiners considered the fact that the bank had a significant portion of its small loans to businesses that did not report revenue information in 2022 through 2023. For 2022 through 2023, the proportion of bank loans to businesses with revenues less than \$1.0 million was significantly below the percentage of businesses and below the aggregate industry distribution of loans to those businesses. Performance in 2024 was consistent with performance 2022 through 2023.

Small Loans to Farms

Refer to Table 12 in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Indianapolis CSA

In 2022-2023, the borrower distribution of small loans to farms was excellent. The proportion of bank loans to farms with revenues less than \$1.0 million was below the percentage farms and exceeded the aggregate industry distribution of loans to those borrowers.

Community Development Lending

The institution was a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Evansville MSA

The institution is a leader in making CD loans and this had a significantly positive impact on the Lending Test rating in the Evansville MSA. During the analysis period, ONB originated nine CD loans totaling \$50.1 million. This equated to 10.1 percent of allocated tier 1 capital. The bank showed responsiveness with 33.3 percent of loans in community service.

The following are examples of CD loans the bank originated or purchased in the MSA:

- ONB originated a \$1.5 million to an organization that offers a helping hand for neighbors in need of housing, food, and spiritual wholeness. The proceeds of the proposed loan will be used to renovate a center used to temporarily shelter women and children.

- ONB made a \$25.5 million to fund the construction of a 161-unit mixed-use multifamily project with 4,653 square feet of ground floor commercial space. This is a community development loan due to the project's revitalization and stabilization of a city-designated priority area for redevelopment as well as the surrounding areas being mainly low-income. This combined with the high barriers to entry created by the extensive State and City incentives committed to the project, making this project a unique opportunity to deliver needed housing in the central business district.
- ONB provided \$1.0 million as working capital to support operations of a non-profit organization to serve the homeless, hungry, and impoverished by providing food, shelter, clothing, mentoring, thrift stores, and summer camps for children.

Indianapolis CSA

The institution is a leader in making CD loans and this had a significantly positive impact on the Lending Test rating in the Indianapolis CSA. During the evaluation period, ONB originated 49 CD loans totaling \$116.5 million. This equated to 39.0 percent of allocated tier 1 capital. The bank showed responsiveness with 66.0 percent of loans in community service. Bank CD lending demonstrated some complexity and leadership.

The following are examples of CD loans the bank originated or purchased in the MSA:

- ONB provided a \$1.2 million CD loan to a small business to support the purchase of commercial real estate. The new property will allow the small business owner to expand its existing childcare services in a moderate-income geography.
- ONB provided a \$45.0 million CD loan to support the construction of a new global headquarters. The site is situated within a low-income census tract and is surrounded by additional LMI tracts. This loan helped to revitalize an area that had been in need of redevelopment for over a decade.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. See "Lending in Assessment Area" section for details on loan programs and loan volumes.

Amish / Mennonite Program

ONB offers home mortgage products targeted towards Amish and Mennonite borrowers. Borrowers in these communities typically do not demonstrate sufficient income to meet the bank's guideline for housing and income ratio. The bank uses a modified cost of living allowance for the debt service calculation. During the review period, the bank originated eight loans with a total amount of \$1.2 million.

Indiana State Housing

The Indiana Housing and Community Development Authority offers Indiana State Housing assistance. Borrowers can qualify for assistance with down payment as low as 2.5 percent. The assistance comes from a second mortgage that requires no interest or payment. The down payment assistance must be

repaid either upon: loan maturity, home sell, refinance, or when the home is no longer an owner-occupied primary residence. During the review period, the bank originated 77 loans totaling \$13.2 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 12 in the state of Indiana section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Bloomington MSA, Fort Wayne MSA, Lafayette MSA, and Terre Haute MSA was consistent with the bank’s overall performance under the Lending Test in the full-scope areas.

INVESTMENT TEST

The bank’s performance under the Investment Test in Indiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Evansville MSA and Indianapolis CSA was excellent.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Bloomington MSA	18	8,712	78	16,257	96	7.1	24,969	9.5	0	0
Evansville MSA	0	0	159	19,865	159	11.8	19,865	7.5	0	0
Fort Wayne MSA	56	29,491	115	7,667	171	12.6	37,157	14.1	0	0
Indiana Non-MSA	33	15,660	248	22,597	281	20.8	38,257	14.5	1	4,000
Indianapolis CSA	159	43,573	374	53,967	533	39.4	97,540	37.0	0	0
Lafayette MSA	13	13,151	46	23,819	59	4.4	36,970	14.0	0	0
Terra Haute MSA	1	6,015	51	2,670	52	3.8	8,685	3.3	0	0
Broader Statewide or Regional Area	1	250	0	0	1	0.1	250	0.1	0	0
Total	281	116,852	1,071	146,842	1,352	100.0	263,694	100.0	1	4,000

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Evansville MSA

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors. In total, the bank had 159 qualified investments for \$19.9 million. The dollar volume of current period investments represented 4.0 percent of allocated tier 1 capital. This volume accounts for only those investments made in the AA in 2024, investments from 2022 and 2023 are included in the Evansville MMSA.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar

volume, 95.5 percent of investments supported affordable housing, 3.6 percent supported community services, and 0.9 percent promoted economic development.

The following are examples of qualified investments in the AA:

- Grants totaling \$107,700 to a community service organization that provides services, such as food, housing, and education to those living in poverty.
- A \$20,000 grant to an affordable housing organization. This grant was used to help the organization open a warehouse to construct parts of homes regardless of weather and then transport them to the jobsite. This is expected to double the number of homes the organization can build.
- An \$86,900 grant to an organization supporting economic development by fostering business growth and retention, improving and expanding infrastructure, and attracting a workforce.

Indianapolis CSA

The institution had an excellent level of qualified investments, including grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 32.6 percent of allocated tier 1 capital.

The institution exhibited good responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume, 33.7 percent of investments supported affordable housing, 62.4 percent supported community services, 3.5 percent promoted economic development, and 0.4 percent funded revitalization and stabilization efforts. Bank CD investments demonstrated leadership and complexity.

The following are examples of qualified investments in the AA:

- A \$2.5 million NMTC community service investment that provided access to food in a federally qualified food desert. The investment supported the development of a grocery store in a low-income census tract.
- Two grants totaling \$40,000 to a Community Development Financial Institution (CDFI) to help expand housing affordability opportunities. The grants supported critical home repairs for low-income homeowners and the creation and maintenance of affordable housing units.
- A \$15,000 grant to an organization providing affordable housing opportunities to LMI individuals. This grant helped to expand the program for a broader impact.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington MSA, Fort Wayne MSA, Lafayette MSA, and Terre Haute MSA was consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank’s performance under the Service Test in Indiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on Full-Scope Reviews, the bank’s performance in the Evansville MSA and the Indianapolis CSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’s AA.

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits		Branches						Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Bloomington MSA	7.5	5	6.8	20.0	20.0	0.0	60.0	0.0	6.3	16.3	33.1	32.4	11.9
Evansville MSA	37.9	12	16.2	8.3	25.0	16.7	41.7	8.3	9.7	20.1	39.1	30.9	0.2
Fort Wayne MSA	4.5	4	5.4	0.0	0.0	50.0	50.0	0.0	6.3	20.6	38.3	34.1	0.7
Indiana Non-MSA	18.8	19	25.7	0.0	26.3	63.2	10.5	0.0	0.6	11.9	65.1	22.4	0.0
Indianapolis CSA	22.8	26	35.1	3.8	19.2	30.8	42.3	3.8	8.3	20.7	37.4	31.8	1.8
Lafayette MSA	2.8	3	4.1	0.0	66.7	33.3	0.0	0.0	6.2	16.9	40.0	27.4	9.5
Terra Haute MSA	5.7	5	6.8	0.0	40.0	40.0	0.0	20.0	6.1	21.7	39.8	29.1	3.3
Total	100.0	74	100.0										

Source: FFIEC File - 2020 U.S. Census
 1/1/2022 – 12/31/2024 Bank Data
 Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Evansville MSA

The branch distribution was readily accessible to geographies and individuals of different income levels. The bank had 12 retail branch locations in the Evansville MSA. The proportion of bank branches in low-income CTs is near to the percentage of the population in those geographies. The proportion of bank branches in moderate-income CTs exceeded the percentage of the population in those geographies.

Indianapolis CSA

The branch distribution was readily accessible to geographies and individuals of different income levels. The bank had 26 retail branch locations in the Indianapolis CSA. The proportion of bank branches in low-income CTs is significantly below the percentage of the population in those geographies. The proportion of bank branches in moderate-income CTs is near to the percentage of the population in those geographies. Examiners considered four branches as near to a moderate-income CT and three branches near to a low-income CT which provided additional access to the LMI populations in the AA. The bank provided maps and data that detailed it had branches near to LMI CTs and that the branch usage by LMI people approximated the percentage of LMI people in the AA.

Table 6: Distribution of Branch Openings/Closings		
Branch Openings/Closings		Net change in Location of Branches

Assessment Area	# of Branch Openings	# of Branch Closings	(+ or -)				
			Low	Mod	Mid	Upp	NA
Bloomington MSA							
Evansville MSA							
Fort Wayne MSA							
Indiana Non-MSA		1			-1		
Indianapolis CSA	2		1	1			
Lafayette MSA							
Terra Haute MSA							
Total							

1/1/2022 – 12/31/2024 Bank Data.

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Evansville MSA

The bank did not open or close any branches in the AA throughout the evaluation period.

The bank complements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking located in LMI geographies. The bank also operates eighteen deposit-taking ATMs in the AA, of which five were in low-and-moderate income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Indianapolis CSA

To the extent changes have been made, the institution’s opening and closing of branches had improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one branch in both an LMI CT.

The bank complements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking located in LMI geographies. The bank operates twenty-six deposit-taking ATMs in the AA, of which six were in LMI geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AAs, particularly LMI geographies and/or individuals. All branches in the AA operate during similar banking hours, including weekends.

Community Development Services

Evansville MSA

The bank provided an adequate level of CD services. Bank employees contributed a total of 4,100 hours on 1921 instances providing support to LMI individuals and families. This included serving on committees and boards, teaching financial literacy while promoting affordable housing, community services, and economic developments for LMI communities within the AA.

The following are examples of CD services provided in this AA:

- Four bank employees provided 575 hours of financial and accounting support to a not-for-profit organization that oversees the sales, operations and charitable donations through sporting events.

The organization partners with federal programs to provide financial and voucher assistance to LMI families with childcare needs.

- Four bank employees provided 513 hours as board members to organization that provide a safe environment for individuals and families in LMI geographies. The group leads fundraising, communications, and marketing events. Through sponsorships and donations, the organization provides emergency services, including shelter and meals to aid the homeless to secure short-and long-term stability.

Indianapolis CSA

The institution was a leader in providing CD services.

Bank employees contributed a total of 1,969 hours on 931 instances supporting community service, affordable housing, economic development and revitalization/stabilization organizations for LMI individuals and geographies across the AA. The majority of employees served in leadership roles as board members, providing technical assistance and financial literacy.

The following are examples of CD services in this AA:

- Bank employees provided technical assistance and financial literacy training to a community-based nonprofit organization providing essential programs that promote education, financial stability, and social well-being for LMI individuals and families.
- Bank employees provided mentoring and training hours to a nonprofit organization that offers financial literacy, robotics and other mentoring-based educational programs for LMI geographies in the AA.
- Bank employees provided community services hours as technical assistance to an organization with a strategic focus on at-risk inner-city youths by providing mentorship, financial education and financial empowerment to underserved communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bloomington MSA, Fort Wayne MSA, Indiana Non-MSA, Lafayette MSA, and Terre Haute MSA was consistent with the bank's overall performance under the Service Test in the full-scope areas. Based on limited-scope reviews, the bank's performance under the Service Test in the Fort Wayne MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas. Weaker performance was due to no bank branches in LMI CTs. Limited-scope performance supported the overall rating.

State Rating

State of Kentucky

CRA rating for the State of Kentucky⁸: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and business of different sizes.
- The bank made an excellent level of CD loans. CD loans had a significantly positive impact on the Lending Test rating.
- The institution provided a good level of CD investments. Performance in the limited-scope AAs had a positive impact on the overall Investment Test conclusion.
- Service delivery systems were unreasonably inaccessible to geographies and individuals of different income levels. The bank provided a good level of CD services.

Description of Institution's Operations in Kentucky

ONB had three AAs in the state of Kentucky: Lexington-Fayette-Richmond-Frankfort, KY MSA (Lexington MSA), Kentucky Non-MSA, and Owensboro, KY MSA (Owensboro MSA). The Owensboro MSA received a full-scope review. For the Kentucky Non-MSA, all counties were combined and analyzed as one AA. The remaining AAs received limited-scope reviews. The AAs meet the requirements of the regulation and do not arbitrarily exclude LMI CTs. The bank's operations in Kentucky comprised 2.0 percent of total bank deposits. The AAs meet the requirements of the regulation and do not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

Owensboro MSA

The Owensboro MSA is comprised of the whole Daviess County. As of the 2020 U.S. Census, the Owensboro MSA contained 24 CTs, of which, 25.0 percent were designated as moderate-income CTs, 50.0 percent middle-income CTs, and 20.8 percent upper-income CTs, and the remaining 4.2 percent

⁸ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

had no income designated as unknown income CTs. There were no low-income CTs. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI CTs. The Owensboro MSA had a population of 103,312 of which 21.1 percent are moderate-income households.

As of June 30, 2024, the bank had \$148.7 million in deposits in the Owensboro MSA, representing 0.4 percent of the bank's total deposits. During the evaluation period, the bank made \$108.4 million or 1.0 percent of its total dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated two full-service branches and three deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 12 FDIC-insured institutions operating 27 branches in the AA. The bank ranked seventh in deposit market share with 4.9 percent. The top five competitors by deposit market share were Independence Bank of Kentucky, U.S Bank, NA., Truist Bank, JPMorgan Chase Bank, NA., and South Central Bank, Inc. The top five banks hold a combined 75.5 percent of market share.

According to Moody's Analytics report as of December 2024, the Owensboro MSA strengths include affordable housing, low living and business costs, and low consumer debt-to-income ratio. Weaknesses include slowdown in manufacturing, low education attainment, below-average incomes, shallow pool of prime-aged workers, and few jobs in tech and higher-value added services. Major employment industries include mining, construction, education and health services, and government. Major employers include Owensboro Medical Health System, U.S. Bank Home Mortgage, Toyotetsu Mid America LLC, Specialty Food Group, and UniFirst Corp.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Owensboro MSA was 3.8 percent in January 2022, increasing to 4.9 percent in December 2024. During the same period, the broader Kentucky statewide unemployment levels were at 4.6 percent and 5.0 percent during the same evaluation period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2024 U.S. Census, 12.9 percent of families in the Owensboro MSA had income below the federal poverty line.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 15.4 percent, with the number of housing units in the AA representing 43,348 at the end of the evaluation period. Of that amount, 26,792 are owner-occupied, while 13,437 are occupied rental units, and 3,119 units sit vacant, representing 61.8 percent, 31.0 percent, and 7.2 percent of total housing units, respectively. The median housing value of housing units for the Owensboro MSA was \$140,300 at the end of the evaluation period.

The OCC evaluated the differences between the median income of families within the AA and the cost of housing. Low-income families earned less than \$3,554 within the AA, while moderate-income families earned from \$3,554 to \$5,687 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. For the evaluation period, the calculated maximum affordable monthly mortgage payment was \$1,066 for a low-income borrower and \$1,706 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down

payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$933. Based on these calculations, some low-income and all moderate-income borrowers would be able to qualify for a mortgage loan at the median housing value within the AA.

We utilized two community contacts from 2023. The organizations focused on affordable housing and economic development. The first contact specializes in home improvement. The contact noted that there’s opportunity for tax-free investments, such as LIHTCs. The organization indicated with the low housing stock and increasing interest rates opportunities for home mortgage originations were limited. The second contact offers programs about startup businesses on how to access funds to retain businesses. There is opportunity to work with the city to clean up old properties’ buildings, and to build assisted living facilities. The contact also stated there is a need for financial institutions to get more involved with housing, financial literacy, and promoting lending products.

Owensboro MSA

Assessment Area(s) - Owensboro MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.00	25.00	50.00	20.83	4.17
Population by Geography	103,312	0.00	21.09	55.28	21.67	1.95
Housing Units by Geography	43,348	0.00	23.97	54.38	19.98	1.67
Owner-Occupied Housing by Geography	26,792	0.00	16.63	57.94	24.65	0.78
Occupied Rental Units by Geography	13,437	0.00	36.36	49.66	11.42	2.56
Vacant Units by Geography	3,119	0.00	33.63	44.15	16.67	5.55
Businesses by Geography	3,476	0.00	21.23	47.55	23.13	8.08
Farms by Geography	254	0.00	8.66	56.30	33.46	1.57
Family Distribution by Income Level	26,822	21.62	17.52	19.69	41.17	0.00
Household Distribution by Income Level	40,229	24.20	15.86	17.62	42.33	0.00
Unemployment rate (%)	4.35	0.00	5.86	4.05	3.54	10.78
Households Below Poverty Level (%)	15.35	0.00	26.05	12.99	8.55	32.01
Median Family Income (36980 - Owensboro, KY MSA)		\$68,141			Median Housing Value	\$140,300
Median Family Income (36980 - Owensboro, KY MSA) for 2024		\$85,300			Median Gross Rent	\$784
					Families Below Poverty Level	12.87
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Kentucky

We conducted a full-scope review of the Owensboro MSA. The Owensboro MSA had 18.0 percent of deposits and 47.1 percent of all HMDA, small business, and small farm loan originations within Kentucky.

For the Lending Test, when evaluating geographical and borrower distribution of loans, we gave the most weight to the performance of home mortgage loans. We gave the most weight to the home mortgage performance due to it comprising 70.0 percent of all HMDA, small business, and small farm loan originations.

For geographical distribution of loans, there were no low-income CTs in the Owensboro MSA, therefore we placed all weight on performance in moderate-income geographies. The bank did not make enough small loans to farms in the Owensboro MSA to conduct a meaningful analysis for lending activity, geographical distribution, and borrower distribution.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

LENDING TEST

The bank’s performance under the Lending Test in Kentucky is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Owensboro MSA was good.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								2022-2024	
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Kentucky Non-MSA	334	110	41	1	NA	486	41.2	71.0	
Lexington MSA	103	32	0	2	NA	137	11.6	11.0	
Owensboro MSA	360	186	7	3	NA	556	47.2	18.0	
Total	797	328	48	6	NA	1,179	100.0	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Kentucky Non-MSA	32,490	23,492	6,264	2,300	NA	64,546	28.1	71.0	
Lexington MSA	35,736	12,423	0	5,737	NA	53,896	23.5	11.0	
Owensboro MSA	65,711	42,257	445	2,964	NA	111,377	48.5	18.0	
Total	133,937	78,172	6,709	11,001	NA	229,819	100.0	100.0	
Source: 1/1/2022 – 12/31/2024 Bank Data.									
Due to rounding, totals may not equal 100.0%									

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Owensboro MSA

According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$148.7 million in deposits in the Owensboro MSA. The bank deposits were equivalent to a 4.9 percent deposit market share in the AA. The bank’s deposit market share ranked seventh out of 12 deposit taking institutions. The bank market share ranking was in the top 58.3 percent.

According to 2024 peer HMDA data, the bank made 118 mortgage loans totaling \$20.6 million. The bank’s HMDA originations were equivalent to 4.6 percent market share of HMDA originations. The bank’s market share of HMDA originations was near to its deposit market share. The bank’s market share of HMDA originations ranked fourth out of 156 home mortgage lenders in the AA. The bank’s market share ranking was in the top 2.6 percent of all HMDA lenders in the AA. The bank’s market

share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 small business data, the bank made 64 loans totaling \$12.7 million. The bank small business loan originations were equivalent to 4.0 percent market share in the AA. The bank's market share of small business loan originations was below its deposit market share. The bank's market share of small business loan originations ranked ninth out of 56 small business lenders. The bank's market share ranking, relative to all lenders, ranked in the top 16.1 percent of all lenders. The bank's market share ranking, relative to all lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table 7 in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Owensboro MSA

The geographical distribution of home mortgage loans was adequate. There were no low-income CTs in the AA. The proportion of bank home mortgage loans to moderate-income CTs was below both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

Refer to Table 9 in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Owensboro MSA

The geographical distribution of small loans to businesses was excellent. There were no low-income CTs in the AA. The proportion of bank small loans to businesses in moderate-income CTs exceeded both the percentage of businesses and the aggregate industry distribution of loans to those businesses.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Owensboro MSA

The borrower distribution of home mortgage loans was adequate. The proportion of bank home mortgage loans to low-income borrowers was significantly below the percentage of families and the aggregate industry distribution of loans to those borrowers. The proportion of bank loans to moderate-income borrowers exceeded the percentage of families and approximated the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Owensboro MSA

The borrower distribution of small loans to businesses was adequate. The proportion of bank small loans to businesses was well below the percentage of businesses and below the aggregate industry distribution of loans to those borrowers.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Owensboro MSA

The bank made an excellent level of CD loans. During the evaluation period, ONB originated three CD loans totaling \$3.0 million. This equated to 17.0 percent of allocated tier 1 capital. The bank showed responsiveness with 66.7 percent of loans in economic development.

The following are examples of CD loans the bank originated or purchased in the MSA:

- ONB used \$1.6 million to finance the construction of a shopping center located in a moderate-income tract. The tenants are businesses that provide essential health and food services to the surrounding community. Based on the nature of the businesses occupying the space, many of the jobs are presumed to be low- or moderate-income positions, such as medical support staff, food service workers, and administrative roles.
- ONB used \$1.0 million to finance tenant improvements within a 9,200-square foot medical office building originally constructed in shell condition in 2019. The tenant provides a Medicaid

program designed to help eligible seniors meet their healthcare needs in the community rather than in nursing homes or institutional care facilities. The majority of those receiving care qualify for Medicaid.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. See the *Lending in Assessment Area* section for details on loan programs and loan volumes.

Conclusions for Area Receiving a Limited-Scope Review

Refer to Tables 7 through 14 in the state of Kentucky section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank’s performance under the Lending Test in the Kentucky Non-MSA was consistent with the bank’s overall performance under the Lending Test in the full-scope area. Based on a limited-scope review, the bank’s performance under the Lending Test in the Lexington MSA was weaker than the bank’s overall performance under the Lending Test in the full-scope area. Weaker performance was due to a smaller proportion of bank loans as compared to demographic and aggregate comparators for geographical distribution for home mortgage and small business loans, and a smaller proportion of bank loans to businesses with revenues less than \$1 million. Performance in limited-scope AAs supported the overall Lending Test rating.

INVESTMENT TEST

The bank’s performance under the Investment Test in Kentucky is rated High Satisfactory. Performance in the limited-scope AAs had a positive impact on the overall conclusions.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Owensboro MSA was adequate.

The institution exhibited excellent responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*									2022-2024	
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kentucky Non-MSA	3	318	32	5,935	35	34.0	6,253	71.5	0	0
Lexington MSA	20	1,005	16	703	36	35.0	1,708	19.5	0	0
Owensboro MSA	3	129	29	658	32	31.0	787	9.0	0	0
Total	26	1,452	77	7,296	103	100.0	8,748	100.0	0	0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Owensboro MSA

The institution had an adequate level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The bank had 32 qualified investments totaling \$787,000. The dollar volume of current and prior period investments represented 4.5 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives. By dollar volume, 82.4 percent of investments supported affordable housing, 16.0 percent supported community services, and 1.6 percent promoted economic development. The following are examples of qualified investments in the AA:

- A \$10,000 grant to a community service organization. The grant supported a program teaching youth about financial responsibility, community involvement, and philanthropy.
- A \$50,000 grant to a community service organization serving LMI youth in underserved communities. The grant funded an after-school program that allows participants to explore their interest in technology and helps increase digital literacy.
- A \$169,939 investment in mortgage-backed securities supporting affordable housing in the AA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Lexington MSA and Kentucky Non-MSA was stronger than the bank’s overall performance under the Investment Test in the full-scope area. In the Lexington MSA, the bank made 36 investments, totaling \$1.7 million, representing 16.0 percent of allocated tier 1 capital. In the Kentucky Non-MSA, the bank made 35 investments, totaling \$6.3 million, representing 9.1 percent of allocated tier 1 capital. The performance in these AAs was excellent. Performance in the limited-scope AAs had a positive impact on the overall state rating.

SERVICE TEST

The bank’s performance under the Service Test in Kentucky is rated Needs to Improve.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Owensboro MSA was poor.

Retail Banking Services

Service delivery systems were unreasonably inaccessible to geographies and individuals of different income levels in the institution’s AA.

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Kentucky Non-MSA	71.0	6	66.7	0.0	16.7	33.3	50.0	0.0	7.3	23.0	34.0	32.8	2.9
Lexington MSA	11.0	1	11.1	0.0	0.0	0.0	0.0	100.0	0.0	21.1	55.3	21.7	2.0
Owensboro MSA	18.0	2	22.2	0.0	0.0	50.0	0.0	50.0	0.0	6.2	67.6	26.2	0.0
Total	100.0	9	100.0										

Source: FFIEC File – 2020 U.S. Census
 1/1/2022 – 12/31/2024 Bank Data
 Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Owensboro MSA

Retail branch distribution was unreasonably inaccessible to geographies and individuals of different income levels. The bank had two retail branch locations in the AA. The proportion of bank branches in both LMI CTs is significantly below the percentage of the population in those geographies.

The bank complements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking located in LMI geographies. The bank operates three deposit-taking ATMs in the AA, of which none were in a low-income and moderate-income geography.

Table 6: Distribution of Branch Openings/Closings							
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)				
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp	NA
Kentucky Non-MSA	1					1	
Lexington MSA							
Owensboro MSA		1			-1		
Total	1	1					

1/1/2022 – 12/31/2024 Bank Data.

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Owensboro MSA

To the extent changes have been made, the institution’s opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Community Development Services

Owensboro MSA

The bank provided a good level of CD services.

Bank employees provided a total of 578 hours on 255 instances supporting community service and economic development to organizations in the AA that primarily benefited LMI individuals and geographies. Bank services demonstrated some leadership and complexity.

The following are examples of CD Services in this AA:

- A bank employee provided community services hours serving in a technical assistance capacity for an organization that provides after-school programs, leadership development and academic support to LMI geographies in the AA.

- A bank employee provided community services hours serving in a technical assistance capacity to a nonprofit organization that advocates for neglected, abused children from low-and moderate-income households, helping to ensure a safe, stable living environment.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Kentucky Non-MSA and Lexington MSA was consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Michigan

CRA rating for the State of Michigan⁹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AAs credit needs.
- The bank exhibited a good geographic distribution of loans.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and business of different sizes.
- The bank was a leader in providing CD loans. CD loans had a significantly positive impact on the Lending Test rating.
- The bank made extensive use of innovative and flexible loans. Innovative and flexible loans had a positive impact on the lending Test rating.
- The institution had an excellent level of qualified investments, including grants.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels. The institution provided a relatively high level of CD services. Limited-scope performance had a positive impact on the Service Test conclusion.

Description of Institution's Operations in Michigan

ONB had four AAs in the state of Michigan: Detroit-Warren-Ann Arbor CSA (Detroit CSA), Grand Rapids-Wyoming-Kentwood MSA (Grand Rapids MSA), Jackson MSA, and Kalamazoo-Battle Creek-Portage CSA (Kalamazoo CSA). The Detroit CSA and the Grand Rapids MSA received full-scope reviews. The remaining AAs received limited-scope reviews. The AAs meet the requirements of the regulation and do not arbitrarily exclude LMI CTs. The bank's operations in Michigan comprised 4.3 percent of total bank deposits. See appendix A for a list of the counties.

Detroit CSA

⁹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The Detroit CSA comprised of the following four whole counties: Lenawee, Livingston, Monroe, and Washtenaw. As of the 2020 U.S. Census, the Detroit CSA contained 233 CTs, of which, 6.4 percent were designated as low-income CT's, 14.6 percent as moderate-income CTs, 44.6 percent middle-income CTs, and 29.2 percent upper-income CTs, and the remaining 5.2 percent had no income designated as unknown income CTs.

The population of the Detroit CSA as reported through the 2020 U.S. Census was 820,356 of which 5.7 percent are low-income households and 13.4 percent are moderate-income households.

As of June 30, 2024, the bank had \$934.1 million in the Detroit CSA, representing 2.3 percent of the bank's total deposits. During the evaluation period, the bank made \$425.2 million or 4.1 percent of its total dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated ten full-service branches and ten deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 22 FDIC-insured institutions operating 156 branches in the AA. The bank ranked tenth in deposit market share with 4.7 percent. The top five competitors by deposit market share are JPMorgan Chase Bank, NA., The Huntington National Bank, Bank of Ann Arbor, PNC Bank, N.A. and KeyBank, N.A. The top five banks hold a combined 57.2 percent of market share.

According to Moody's Analytics report as of October 2025, the Detroit CSA area's strengths include high concentration of auto industry headquarters, production and R&D, low cost of living and low cost of doing business. Weaknesses include below average quality of life, high crime rate, and eroding infrastructure, shrinking population and smaller-than-average working age cohort. Major employment industries include education and health services, professional and business services, manufacturing, government and leisure and hospitality services. Major employers include Ford Motor Co., Rocket Cos Inc., Henry Ford Health, Corewell Health and Blue Cross, Blue Shield of Michigan.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Detroit CSA ranged from 3.3 to 4.9 percent in January 2022, increasing to 3.4 to 5.3 percent in December 2024. During the same period, the broader Michigan statewide unemployment levels were at 5.0 percent and 5.0 percent during the same evaluation period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2024 U.S. Census, 5.9 percent of families in the Detroit CSA had income below the federal poverty line.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 10.5 percent, with the number of housing units in the AA representing 337,427 at the end of the evaluation period. Of that amount, 229,107 are owner-occupied, while 86,335 are occupied rental units, and 21,985 units sit vacant, representing 67.9 percent, 25.6 percent, and 6.5 percent of total housing units, respectively. The median housing value of housing units for the Detroit MSA was \$209,800 at the end of the evaluation period.

To determine the difference between the median income of families within the AA and the cost of housing, the OCC evaluated the disparity between the median income of families within the AA (Detroit CSA 2024) and the cost of housing. Low-income families earned less than \$4,384 within the AA, while

moderate-income families earned from \$4,384 to \$7,015 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant’s income. For the evaluation period, the calculated maximum affordable monthly mortgage payment \$1,315 for a low-income borrower and from \$2,104 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$1,396. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for a mortgage loan at the median housing value within the AA.

The OCC utilized two community contacts made in 2022 and 2023, from various community assistance programs. One of the organizations supports businesses in pursuit of the “go green” concept. They are affiliated with a commercial energy loan program which provides businesses with affordable low interest loans to make energy efficient upgrades. This is an initiative for banks to get involved in funding small businesses in the Detroit CSA had a diverse population and financial challenges for start-ups and small business owners. The organization noted that the area is still recovering from COVID and continues to see labor strikes and job losses in the financial services sector. The second organization provides economic development services including business training, technical assistance, mentoring programs, a peer support system, and special programs for high technology firms. The second contact stated that the community had a need for affordable housing and home improvement in LMI tracts, of which the county is working to improve.

Detroit CSA

Assessment Area(s) - Detroit CSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	233	6.44	14.59	44.64	29.18	5.15
Population by Geography	820,356	5.72	13.35	45.55	31.64	3.74
Housing Units by Geography	337,427	5.95	14.48	46.09	31.55	1.92
Owner-Occupied Housing by Geography	229,107	2.40	11.25	49.53	36.67	0.14
Occupied Rental Units by Geography	86,335	15.29	22.43	37.35	18.65	6.29
Vacant Units by Geography	21,985	6.27	17.05	44.48	28.83	3.37
Businesses by Geography	31,362	4.53	13.30	43.73	36.43	2.01
Farms by Geography	1,841	1.52	7.39	59.53	31.29	0.27
Family Distribution by Income Level	199,794	18.11	17.98	22.04	41.87	0.00
Household Distribution by Income Level	315,442	22.44	15.69	17.89	43.98	0.00
Unemployment rate (%)	4.48	7.48	4.89	4.77	3.27	5.87
Households Below Poverty Level (%)	10.49	27.95	15.92	8.14	5.76	52.65
Median Family Income (11460 - Ann Arbor, MI MSA)		\$105,224		Median Housing Value		\$209,800
Median Family Income (33780 - Monroe, MI MSA)		\$80,507		Median Gross Rent		\$999
Median Family Income (47664 - Warren-Troy-Farmington Hills, MI MD)		\$92,419		Families Below Poverty Level		5.93
Median Family Income (Non-MSAs - MI)		\$63,042				
Median Family Income (11460 - Ann Arbor, MI MSA) for 2024		\$119,500				
Median Family Income (33780 - Monroe, MI MSA) for 2024		\$96,500				
Median Family Income (47664 - Warren-Troy-Farmington Hills, MI MD) for 2024		\$109,700				
Median Family Income (Non-MSAs - MI) for 2024		\$78,300				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Grand Rapids MSA

The Grand Rapids MSA consists of the following two whole counties: Kent and Ottawa. As of the 2020 U.S. Census, the Grand Rapids MSA contained 210 CTs, of which, 4.8 percent were designated as low-income CT's, 17.1 percent as moderate-income CTs, 50.0 percent middle-income CTs, and 26.2 percent upper-income CTs, and the remaining 1.9 percent had no income designated as unknown income CTs.

The population of the Grand Rapids MSA as reported through the 2020 U.S. Census was 954,174 of which 4.2 percent are low-income households and 15.8 percent are moderate-income households.

As of June 30, 2024, the bank had \$360.5 million in the Grand Rapids MSA, representing 0.9 percent of the bank's total deposits. During the evaluation period, the bank made \$596.1 million or 5.7 percent of its total dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated four full-service branches and four deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 25 FDIC-insured institutions operating 214 branches in the AA. The bank ranked 16th in deposit market share with 1.3 percent. The top five competitors by deposit market share are Fifth Third Bank, N.A., The Huntington National Bank, Northpointe Bank, JPMorgan Chase Bank, N.A., and Macatawa Bank. The top five banks hold a combined 68.7 percent of market share.

According to Moody's Analytics report as of October 2025, the Grand Rapids MSA area's strengths include renowned biotech and healthcare center, pro-business environment, diverse manufacturing sector, including technologically advanced producers, strong base of middle-income jobs. Weaknesses include reliance on domestic vehicle industry, overvalued housing market, below-average share of high-wage jobs. Major employment industries include manufacturing, education and health services, professional and business services, leisure and hospitality services and retail trade. Major employers include Corewell Health, Trinity Health, Meritage Hospitality Group Inc, Gordon Food Service and Meijer.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Grand Rapids MSA ranged from 3.8 percent in January 2022, increasing to 4.3 percent in December 2024. During the same period, the broader Michigan statewide unemployment levels were at 5.0 percent and 5.0 percent during the same evaluation period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2024 U.S. Census, 6.2 percent of families in the Grand Rapids MSA are below the federal poverty level.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 9.6 percent, with the number of housing units in the AA representing 367,663 at the end of the evaluation period. Of that amount, 254,191 are owner-occupied, while 95,190 are occupied rental units, and 18,282 units sit vacant, representing 69.1 percent, 25.9 percent, and 5.0 percent of total housing units, respectively. The median housing value of housing units for the Grand Rapids MSA was \$190,000 at the end of the evaluation period.

The OCC evaluated the difference between the median income of families in the AA and the cost of housing. Low-income families earned less than \$4,067 within the AA, while moderate-income families earned from \$4,067 to \$6,507 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant’s income. For the evaluation period, the calculated maximum affordable monthly mortgage payment \$1,220 for a low-income borrower and from \$1,952 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$1,264. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for a mortgage loan at the median housing value within the AA.

The OCC utilized two community contacts from 2022. One of the organizations supports businesses by connecting businesses within the community for business expansion, community development, training and creating opportunities and project that develop and enhance the community. The organization stated that there is a major need within the community for housing. The second organization is a non-profit organization that provides various housing services including home accessibility modifications, general home repair and maintenance workshops, and housing counseling education services. The organization stated that incomes have not kept up with the housing market. Minimum wage slowly increased, but not enough to make mortgage payments affordable. People that are working minimum wage jobs need to either find new jobs or resort to homelessness.

Grand Rapids MSA

Assessment Area(s) - Grand Rapids MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	210	4.76	17.14	50.00	26.19	1.90
Population by Geography	954,174	4.16	15.81	48.32	30.77	0.94
Housing Units by Geography	367,663	3.42	16.36	50.17	28.76	1.30
Owner-Occupied Housing by Geography	254,191	1.50	12.11	49.98	35.27	1.15
Occupied Rental Units by Geography	95,190	8.22	26.44	51.39	12.42	1.53
Vacant Units by Geography	18,282	5.19	22.99	46.43	23.24	2.15
Businesses by Geography	35,595	2.24	16.69	43.83	36.43	0.81
Farms by Geography	1,412	0.92	8.92	50.71	38.74	0.71
Family Distribution by Income Level	237,965	17.58	17.61	23.03	41.79	0.00
Household Distribution by Income Level	349,381	21.49	16.39	19.50	42.62	0.00
Unemployment rate (%)	4.42	11.42	5.72	3.99	3.62	6.15
Households Below Poverty Level (%)	9.56	33.85	16.81	8.62	4.34	11.20
Median Family Income (24340 - Grand Rapids-Wyoming-Kentwood, MI MSA)		\$79,594		Median Housing Value		\$190,000
Median Family Income (24340 - Grand Rapids-Wyoming-Kentwood, MI MSA) for 2024		\$97,600		Median Gross Rent		\$932
				Families Below Poverty Level		6.22
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Michigan

We conducted full-scope reviews on the Detroit CSA and the Grand Rapids MSA. When evaluating performance for the Lending Test we gave slightly more weight to the bank's conclusions for lending activity, geographical, and borrower distribution of loans to the Grand Rapids MSA. We gave more weight to the Grand Rapids MSA due to it having a slightly larger percentage of statewide home mortgages and small business loans. For the Lending Test ratings and conclusions, we gave more weight to the performance of home mortgages due to it having a significantly greater volume of loans as compared to small business loans. The bank did not originate enough small farm loans in its AAs to have a meaningful analysis. When evaluating performance for the Investment Test we gave more weight to the Detroit CSA due to it having a significantly greater percentage of statewide deposits. When evaluating performance for the Service Test we gave more weight to performance in the Detroit CSA due to it having a larger percentage of statewide retail branch locations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

The bank's performance under the Lending Test in Michigan is rated High Satisfactory. CD lending had a significantly positive impact on the Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Detroit CSA was adequate. Based on full-scope reviews, the bank's performance in the Grand Rapids was good.

Lending Activity

Lending levels reflected good responsiveness to AAs credit needs.

Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Detroit CSA	1,272	361	4	11	NA	1,648	40.8	53.2
Grand Rapids MSA	1,421	430	3	7	NA	1,861	46.1	20.5
Jackson MSA	98	14	0	1	NA	113	2.8	2.8
Kalamazoo CSA	240	159	0	15	NA	414	10.3	23.5
Total	3,031	964	7	34	NA	4,036	100.0	100.0
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Detroit CSA	332,670	91,974	573	18,402	NA	443,619	33.8	53.2
Grand Rapids MSA	475,207	120,313	602	49,670	NA	645,792	49.2	20.5
Jackson MSA	25,650	2,310	0	10,528	NA	38,488	2.9	2.8
Kalamazoo CSA	126,488	40,040	0	18,576	NA	185,104	14.1	23.5
Total	960,015	254,637	1,175	97,176	NA	1,313,003	100.0	100.0

Source: 1/1/2022-12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Detroit CSA

Lending levels reflected good responsiveness to AA credit needs. According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$934.2 million in deposits in the Detroit CSA. The bank deposits were equivalent to a 4.7 percent deposit market share in the AA. The bank deposit market share ranked tenth out of 22 deposit taking institutions. The bank market share ranking was in the top 45.5 percent.

According to 2024 peer HMDA data, the bank made 397 mortgage loans totaling \$107.7 million. The bank's HMDA originations were equivalent to 2.1 percent market share of HMDA originations. The bank's market share of HMDA originations was significantly below its deposit market share. The bank's market share of HMDA originations ranked eighth out of 428 home mortgage lenders in the AA. The bank's market share ranking was in the top 1.9 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative all to deposit taking institutions.

According to 2023 peer small business data, the bank made 118 loans totaling \$28.1 million. The bank small business loan originations were equivalent to 0.8 percent market share in the AA. The bank's market share of small business loan originations was significantly below its deposit market share. The bank's market share of small business loan originations ranked 16th out of 107 small business lenders. The bank market share ranking, relative all lenders, ranked in the top 15.0 percent of all lenders. The bank's market share ranking, relative to all lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

Grand Rapids MSA

Lending levels reflected excellent responsiveness to AA credit needs. According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$360.5 million in deposits in the Grand Rapids MSA. The bank deposits were equivalent to a 1.3 percent deposit market share in the AA. The bank deposit market share ranked 16th out of 25 deposit taking institutions. The bank market share ranking was in the top 64.0 percent.

According to 2024 peer HMDA data, the bank made 446 mortgage loans totaling \$124.6 million. The bank's HMDA originations were equivalent to 1.9 percent market share of HMDA originations. The bank's market share of HMDA originations was stronger than its deposit market share. The bank's market share of HMDA originations ranked tenth out of 402 home mortgage lenders in the AA. The bank's market share ranking was in the top 24.9 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small business data, the bank made 144 loans totaling \$41.4 million. The bank small business loan originations were equivalent to 0.8 percent market share in the AA. The bank's market share of small business loan originations was well below its deposit market share. The bank's market share of small business loan originations ranked 15th out of 102 small business lenders. The bank's market share ranking, relative to all lenders, ranked in the top 14.7 percent of all lenders. The bank's market share ranking, relative to all lenders, was stronger than its deposit market share ranking, relative all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table 7 in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Detroit CSA

The geographical distribution of home mortgage loans is adequate. The proportion of bank home mortgage loans in low-income CTs was below the percentage of owner-occupied housing and well below the aggregate industry distribution of loans to those geographies. The proportion of bank loans in moderate-income geographies was below both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Grand Rapids MSA

The geographical distribution of home mortgage loans was excellent. The proportion of bank home mortgage loans to low-income CTs exceeded both the percentage of housing and the aggregate industry distribution of loans to those geographies. The proportion of bank loans to moderate-income CTs approximated the percentage of owner-occupied housing and was below the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

Refer to Table 9 in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Detroit CSA

The geographical distribution of small loans to businesses was adequate. The proportion of bank small loans to businesses in low-income CTs was significantly below the percentage of businesses and well below the aggregate industry distribution of loans to those geographies. The proportion of bank loans to moderate-income geographies was below the percentage of businesses and somewhat near to the aggregate industry distribution of loans to those businesses.

Grand Rapids MSA

The geographical distribution of small loans to businesses was good. The proportion of bank small loans to businesses in low-income CTs was well below the percentage of businesses and below the aggregate industry distribution of loans to those geographies. The proportion of bank loans to moderate-income CTs exceeded both the percentage of businesses and the aggregate industry distribution of loans to those borrowers.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Detroit CSA

The borrower distribution of home mortgage loans was adequate. When determining conclusions for borrower distribution, examiners considered that the median family home price was not affordable to low-income borrowers. When determining our conclusions we gave more weight to performance compared to the industry aggregate distribution. The proportion of bank home mortgage loans to low-income borrowers was significantly below the percentage of families and below the aggregate industry distribution of loans to those borrowers. The proportion of bank loans to moderate-income borrowers was near to the percentage of families and below the aggregate industry distribution of loans to those borrowers.

Grand Rapids MSA

The borrower distribution of home mortgage loans was adequate. When determine our conclusion for borrower distribution, examiners considered that the median family home price was not affordable to low-income borrowers. Therefore, we gave more weight in the conclusions to the aggregate distribution of loans to low-income borrowers. The proportion of bank home mortgage loans to low-income borrowers was significantly below both the percentage of families and the aggregate industry distribution of loans to those borrowers. The proportion of bank loans to moderate-income borrowers exceeded the percentage of families and was below the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Detroit CSA

The bank exhibits a poor distribution of loans to businesses with revenues less than \$1 million. The proportion of bank loans to businesses with revenues less than \$1.0 million was significantly below the percentages of businesses and well below the aggregate industry distribution of loans to those borrowers.

Grand Rapids MSA

The bank exhibits a poor distribution of loans to businesses with revenues less than \$1 million. The proportion of bank loans to businesses with revenues less than \$1.0 million was significantly below the percentages of businesses and well below the aggregate industry distribution of loans to those borrowers.

Community Development Lending

The institution was a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Detroit CSA

The bank made an excellent level of CD loans. During the evaluation period, ONB originated 11 CD loans totaling \$18.4 million. CD loan volume was equivalent to 16.9 percent of allocated tier 1 capital. Bank CD loans were responsive to affordable housing needs, with 63.6 percent of CD loan volume benefitting affordable housing. Bank CD loans demonstrated some complexity and leadership.

The following are examples of CD loans the bank originated or purchased in the AA:

- ONB financed \$5.7 million support of an affordable housing project for LMI people, which provides permanent supportive housing. Half of the rents are below HUD's LMI rent threshold. The other units are below HUD's LMI rent threshold with up to 50 percent of Veteran's Administration Supportive Housing and MSHDA assistance. Tenants are only required to pay 30 percent of their income for rent.
- ONB had an affordable housing loan of \$2.8 million to purchase two multifamily apartment buildings. Rents are affordable compared to HUD fair market rent standards.

Grand Rapids MSA

The bank made an excellent level of CD loans. Throughout the evaluation period, ONB originated seven CD loans totaling \$49.7 million. CD loan volume was equivalent to 118.3 percent of allocated tier 1 capital. Bank CD lending was responsive to community service needs and revitalization and stabilization efforts. ONB showed responsiveness with 42.9 percent of CD loan volume in both community service and revitalization and stabilization. Bank CD loans demonstrated some complexity and leadership.

The following are examples of CD loans the bank originated or purchased in the AA:

- ONB provided \$25 million to a for-profit education management organization that operates more than 100 charter schools across nine states, serving over 60,000 students in kindergarten through 12th grade. Majority of the students enrolled in NHA schools qualify for free or reduced-price lunch, indicating that the schools primarily serve LMI families.

- ONB provided a \$17.0 million loan and letter of credit to support a transformative initiative aimed at expanding high-speed internet access across Michigan. This strategic investment directly supports the deployment of broadband infrastructure to unserved and underserved communities.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. See the *Lending in Assessment Area* section for details on loan programs and loan volumes.

Michigan State Housing

The Michigan Home loan program is a mortgage product that is available to first-time homebuyers state-wide and repeat homebuyer in targeted areas. To be eligible the borrower must have a household income below the local limit based on family size and property location. During the evaluation period, the bank originated 72 loans totaling \$10.4 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 10 in the state of Michigan section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Jackson MSA was stronger than the bank's overall performance under the Lending Test in the full-scope areas. Stronger performance was due to a higher proportion of bank loans as compared to both HMDA and small business borrower distribution. Based on limited-scope reviews, the bank's performance under the Lending Test in the Kalamazoo MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. Limited-scope performance supported the overall Lending Test conclusion.

INVESTMENT TEST

The bank's performance under the Investment Test in Michigan is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Detroit CSA and Grand Rapids MSA was excellent.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Detroit CSA	76	7,245	171	7,630	247	48.1	14,875	22.1	0	0
Grand Rapids MSA	46	9,282	88	11,251	134	26.1	20,533	30.5	0	0
Jackson MSA	1	158	9	712	10	1.9	870	1.3	0	0
Kalamazoo CSA	8	15,142	114	15,575	122	23.7	30,717	45.6	0	0
Broader Statewide or Regional Area	1	347	0	0	1	0.2	347	0.5	1	535
Total	132	32,174	382	35,168	514	100.0	67,342	100.0	1	535

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Detroit CSA

The institution had an excellent level of qualified investments, including grants, but occasionally in a leadership position, particularly those that are not routinely provided by private investors. In total, the bank had 247 qualified investments for \$14.9 million. The dollar volume of investments represented 13.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives. By dollar volume, 96.2 percent of investments supported affordable housing, 3.2 percent supported community services, and 0.6 percent promoted economic development.

The following are examples of qualified investments in the AA:

- Thirteen investments in MBS totaling \$2.6 million, which primarily benefitted LMI people. These investments supported affordable housing in the AA.
- A \$10,000 grant to a community service organization providing food to low-income individuals. The grant supported a program providing food distribution at low-income housing sites for those that face barriers accessing traditional food pantries.
- A \$10,000 grant to an affordable housing organization that builds home for LMI families. The grant supported the build of an energy-efficient home on a previously vacant lot.

Grand Rapids MSA

The institution had an excellent level of qualified investments, including grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. In total, the bank had 134 qualified investments for \$20.5 million. The dollar volume of investments represented 48.9 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives. By dollar volume, 93.7 percent of investments supported affordable housing, 6.3 percent supported community services, and 0.1 percent promoted economic development.

The following are examples of qualified investments in the AA:

- Eleven investments in MBS totaling \$10.6 million, which primarily benefitted LMI people. These investments supported affordable housing in the AA.
- A \$20,000 grant to a community service organization providing workforce development programs. The grant supported a program serving individuals experiencing homelessness by providing comprehensive workforce development services.
- A \$20,000 grant to an affordable housing organization working to expand access to affordable housing. The grant supported a program offering free assistance and resources to aspiring homeowners.

Broader Statewide or Regional Area

In addition, the bank made one investment during the prior period with a remaining book balance of \$346,516 in a mortgage backed security that benefitted affordable housing in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AA. Additionally, there is one unfunded commitment for \$535,308 in the broader statewide or regional area. The broader statewide and regional area investments further supported the overall Investment Test conclusion.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Jackson MSA and Kalamazoo CSA AAs was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the limited-scopes AAs further supported the overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Michigan is rated Low Satisfactory. Limited Scope performance had a positive impact on the Service Test conclusion.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Detroit CSA was good. Based on full-scope reviews, the bank's performance in the Grand Rapids MSA was poor.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits		Branches					Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Detroit CSA	53.2	10	52.6	0.0	10.0	80.0	10.0	0.0	5.7	13.4	45.6	31.6	3.7
Grand Rapids MSA	20.5	4	21.1	0.0	0.0	50.0	50.0	0.0	4.2	15.8	48.3	30.8	0.9
Jackson MSA	2.8	1	5.2	0.0	0.0	0.0	0.0	100.0	4.1	27.5	38.6	25.2	4.6
Kalamazoo CSA	23.5	4	21.1	25.0	0.0	75.0	0.0	0.0	6.0	24.4	37.8	30.9	0.9
Total	100.0	19	100.0										

Source: FFIEC File – 2020 U.S. Census
1/1/2022 – 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Detroit CSA

The branch distribution was reasonably accessible to essentially all LMI geographies. The bank had 10 retail branch locations in the Detroit CSA. The proportion of bank branches in low-income CTs was significantly below the percentage of the population in those geographies. The proportion of bank branches in moderate-income CTs was below the percentage of the population in those geographies. Examiners considered one branch as near to a moderate-income CT and provided additional access to the LMI populations in the AA.

The bank complements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking located in LMI geographies. The bank operates 10 deposit-taking ATMs in the AA, of which one was in a low-income geography.

Grand Rapids MSA

The branch distribution was inaccessible to significant portions of LMI geographies. The bank had four retail branch locations in the Grand Rapids MSA. The proportion of bank branches in low-income CTs was significantly below the percentage of the population in those geographies. The proportion of bank branches in moderate-income CT was significantly below the percentage of the population in those geographies. The bank does not have any branches in LMI geographies.

The bank complements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking located in LMI geographies. The bank operates four deposit-taking ATMs in the AA, of which none were in low-and moderate-income geography.

Detroit CSA

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals.

Grand Rapids MSA

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals.

Community Development Services

The institution provided a relatively high level of CD services.

Detroit CSA

The institution provided a leader in providing CD services.

Bank employees contributed a total of 1,521 hours on 506 instances providing economic development, affordable housing and community service support to LMI individuals and families. This includes serving in leadership roles on boards and committees, teaching financial literacy and technical assistance.

The following are examples of CD services in this AA:

- A bank employee provided leadership, serving on the Board of Directors for an organization that supports economic development and growth for startups and entrepreneurs.
- A bank employee provided technical assistance, serving on the Executive Committee for an organization that promotes long-term regional growth by supporting the manufacturing, aerospace, mobility and defense industries. In turn, this attracts investment and creates jobs for low-and moderate-income communities.

Grand Rapids MSA

The institution provided an adequate level of CD services.

Bank employees contributed a total of 273 hours on 114 instances to organizations providing economic development, affordable housing and community service, supporting LMI individuals across the AA and geographies. Bank employees served on committees and provided financial education and technical assistance.

The following are examples of CD services in this AA:

- A bank employee provided technical assistance to an organization who provides food services, clothing, transportation and shelter to homeless families with children. The bank employee also serves as a committee member.
- A bank employee, Board and Committee member provided technical assistance to a regional economic development organization that supports business growth and innovation, primarily focusing on underserved areas. The organization also promotes workforce development programs, including training and education initiatives.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Jackson MSA was consistent the bank's overall performance under the Service Test in the full-scope areas. Based on limited-scope reviews, the bank's performance under the Service Test in the Kalamazoo MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. Stronger performance is due to the proportion of bank branches in low-income CTs exceeded the percentage of the population in those geographies. Limited-scope performance had a positive impact on the overall Service Test rating.

State Rating

State of Minnesota

CRA rating for the State of Minnesota¹⁰: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- The bank exhibited a poor geographic distribution of loans.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and business and farms of different sizes.
- The institution was a leader in providing CD loans. CD lending had a significantly positive impact on the Lending Test rating.
- The bank made extensive use of innovative and flexible loan products. Innovative and flexible lending had a positive impact on the Lending Test rating. Performance in limited-scope AAs had a positive impact on the Lending Test ratings.
- The institution had an excellent level of qualified investments, including grants.
- Service delivery systems were readily accessible to geographies and individuals of different income levels. The bank was a leader in providing CD services.

Description of Institution's Operations in Minnesota

ONB had three AAs in the state of Minnesota: Mankato MSA, Minneapolis-St. Paul-Bloomington MSA (Minneapolis MSA), Minnesota Non-MSA. For the Minnesota Non-MSA, all Non-MSA counties were combined and analyzed as one AA. The Minneapolis MSA received a full-scope review. The remaining AAs received limited-scope reviews. The AAs meet the requirements of the regulation and do not arbitrarily exclude LMI CTs. The bank's operations in Minnesota accounted for 9.3 percent of total bank deposits. The AAs meets the requirements of the regulation and do not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

Minneapolis MSA

¹⁰ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The Minneapolis MSA is comprised of the following nine whole counties: Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington and Wright counties. As of the 2020 U.S. Census, the Minneapolis MSA contained 830 CTs, of which, 5.9 percent were designated as low-income CT's, 21.3 percent as moderate-income CTs, 43.4 percent middle-income CTs, and 28.1 percent upper-income CTs, and the remaining 1.3 percent had no income and designated as unknown income CTs.

The population of the Minneapolis MSA as reported through the 2020 U.S. Census was 3,401,624 of which 5.4 percent are low-income households and 20.1 percent are moderate-income households.

As of June 30, 2024, the bank had \$3.5 billion in the Minneapolis MSA, representing 8.8 percent of the bank's total deposits. During the evaluation period, the bank made \$1.4 billion or 13.2 percent of its total dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated 28 full-service branches and 29 deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 119 FDIC-insured institutions operating 669 branches in the AA. The bank ranked tenth in deposit market share with 1.5 percent. The top five competitors by deposit market share are U.S. Bank N.A., Wells Fargo Bank, N.A., Ameriprise Bank, FSB, The Huntington National Bank and BMO Bank National Association. The top five banks held a combined 77.0 percent of market share.

According to Moody's Analytics report as of August 2025, the Minneapolis MSA area's strengths include major research institutions and corporate headquarters foster innovation, highly educated workforce, healthy consumer balance sheets and positive population trends. Weaknesses include cold climate, weakening migration trends, relatively high tax burden for businesses and outsize concentration of industries sensitive to interest rate shocks. Major employment industries include education and health services, government, manufacturing, leisure and hospitality services and retail trade. Major employers include Fairview Health Services, Target Corp., Allina Health Systems, University of Minnesota, and Health Partners Inc.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Minneapolis MSA ranged from 2.6 to 3.9 percent in January 2022, decreasing to 2.1 to 2.9 percent in December 2024. During the same period, the broader Minnesota statewide unemployment levels were at 3.4 percent and 2.6 percent during the same evaluation period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2024 U.S. Census, 5.2 percent of families in the Minneapolis MSA are below the federal poverty level.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 8.2 percent, with the number of housing units in the AA representing 1,339,446 at the end of the evaluation period. Of that amount, 893,794 are owner-occupied, while 388,850 are occupied rental units, and 56,802 units sit vacant, representing 66.7 percent, 29.0 percent, and 4.2 percent of total housing units, respectively. The median value of housing units for the Minneapolis MSA was \$265,250 at the end of the evaluation period.

The OCC evaluated the difference between the median income of families in the AA and the cost of housing. Low-income families earned less than \$5,154 monthly within the AA, while moderate-income families earned from \$5,154 to \$8,247 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant’s income. For the evaluation period, the calculated maximum affordable monthly mortgage payment \$1,546 for a low-income borrower and from \$2,474 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$1,765. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for a mortgage loan at the median housing value within the AA.

The OCC utilized seven contacts within the AA, all of which were conducted between 2023 and 2024. These affiliated organizations’ community assistance programs aim at various needs of the community including affordable housing, financing for home loans and commercial lending, affordable small business and personal loans with flexible repayment solutions, deposit accounts without overdraft and a low minimum balance requirement, and down payment assistance for home buying. One organization noted that they are satisfied with the support that the financial institutions including ONB are providing. An organization’s contact confirmed that they have worked with four different financial institutions in the area and noted that they are all involved in community development opportunities.

Minneapolis MSA

Assessment Area(s) - Minneapolis MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	830	5.90	21.33	43.37	28.07	1.33
Population by Geography	3,401,624	5.35	20.08	44.52	29.21	0.83
Housing Units by Geography	1,339,446	5.07	20.51	45.07	28.71	0.64
Owner-Occupied Housing by Geography	893,794	2.38	16.40	48.27	32.86	0.08
Occupied Rental Units by Geography	388,850	10.89	29.82	38.14	19.28	1.86
Vacant Units by Geography	56,802	7.62	21.42	42.08	27.85	1.03
Businesses by Geography	152,543	4.29	18.97	42.55	33.27	0.91
Farms by Geography	4,436	2.07	14.36	50.77	32.62	0.18
Family Distribution by Income Level	814,211	19.48	17.87	22.76	39.89	0.00
Household Distribution by Income Level	1,282,644	22.93	16.76	18.91	41.40	0.00
Unemployment rate (%)	3.73	7.33	5.28	3.31	2.68	6.21
Households Below Poverty Level (%)	8.16	28.64	12.25	6.06	4.46	34.48
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA)		\$103,977		Median Housing Value		\$265,250
Median Family Income (33460 - Minneapolis-St. Paul-Bloomington, MN-WI MSA) for 2024		\$123,700		Median Gross Rent		\$1,165
				Families Below Poverty Level		5.15
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Minnesota

We conducted a full-scope review of the Minneapolis MSA. We conducted the full-scope review due the Minneapolis MSA having 94.1 percent of the statewide deposits and 92.5 percent of all HMDA, small business, and small farm loans.

For the Lending Test, we gave the most weight to the performance of HMDA loans when evaluating geographical and borrower distribution. We gave the most weight to HMDA performance due to those loans comprised 54.5 percent of HMDA, small business, and small farm lending in Minnesota.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

The bank's performance under the Lending Test in Minnesota is rated High Satisfactory. CD lending had a significantly positive impact on the Lending Test conclusion. Performance in the limited-scope AAs had a positive impact on the Lending Test rating.

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA was adequate.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								2022-2024	
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Mankato MSA	42	19	0	0	NA	61	1.4	1.4	
Minneapolis MSA	2,313	1,754	37	47	NA	4,151	92.6	94.3	
Minnesota Non-MSA	62	46	163	0	NA	271	6.0	4.3	
Total	2,417	1,819	200	47	NA	4,483	100.0	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Mankato MSA	9,212	4,037	0	0	NA	13,249	0.8	1.4	
Minneapolis MSA	913,273	455,918	2,868	221,905	NA	1,593,964	96.6	94.3	
Minnesota Non-MSA	5,293	4,410	33,034	0	NA	42,737	2.6	4.3	
Total	927,778	464,365	35,902	221,905	NA	1,649,950	100.0	100.0	
<i>Source: 1/1/2022 – 12/31/2024 Bank Data.</i>									
<i>Due to rounding, totals may not equal 100.0%</i>									

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$3.5 billion in deposits in the Minneapolis MSA. The bank deposits were equivalent to a 1.5 percent deposit market share in the AA. The bank deposit market share ranked tenth out of 119 deposit taking institutions. The bank market share ranking was in the top 8.4 percent.

According to 2024 peer HMDA data, the bank made 680 mortgage loans totaling \$231.3 million. The bank's HMDA originations were equivalent to 0.8 percent market share of HMDA originations. The bank's market share of HMDA originations was well below its deposit market share. The bank's market share of HMDA originations ranked 31st out of 672 home mortgage lenders in the AA. The bank's market share ranking was in the top 4.6 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small business data, the bank made 550 loans totaling \$143.2 million. The bank small business loan originations were equivalent to 0.8 percent market share in the AA. The bank's market share of small business loan originations was well below its deposit market share. The bank's market share of small business loan originations ranked 14th out of 172 small business lenders. The bank market share ranking, relative to all lenders, ranked in the top 8.1 percent of all lenders. The bank's market share ranking, relative to all lenders, was consistent with its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 peer small farm data, the bank made ten loans totaling \$604,000. The bank small farm loan originations were equivalent to 2.0 percent market share in the AA. The bank's market share of small farm loan originations exceeds its deposit market share. The bank's market share of small farm loan originations ranked 11th out of 31 small farm lenders. The bank's market share ranking, relative to all lenders, ranked in the top 35.5 percent of all lenders. The bank's market share ranking, relative to all lenders, was weaker than its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited a poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table 7 in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Minneapolis MSA

The geographical distribution of home mortgage loans was very poor. The proportion of bank home mortgage loans in LMI CTs was significantly below both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

Refer to Table 9 in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Minneapolis MSA

The geographical distribution of small loans to businesses was adequate. The proportion of bank small loans to businesses in low-income geographies was significantly below both the percentage of businesses and the aggregate industry distribution of loans to those geographies. The proportion of bank

loans to moderate-income CTs exceeded both the percentage of businesses and the aggregate industry distribution of loans to those businesses.

Small Loans to Farms

Refer to Table 11 in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Minneapolis MSA

The geographic distribution of small loans to farms was adequate. The bank did not originate any small loans to farms in low-income geographies. The proportion of bank small loans to farms in moderate-income geographies was below the percentage of farms and approximated the aggregate industry distribution of loans in those geographies.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Minneapolis MSA

The borrower distribution of home mortgage loans was good. Examiners considered the fact that home mortgage loans were not affordable to low-income borrowers. Therefore, we gave more weight to the performance compared to the aggregate distribution when evaluating low-income borrower distribution. The proportion of bank home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and was near to the aggregate industry distribution of loans to those borrowers. The proportion of bank loans to moderate-income borrowers exceeded the percentage of moderate-income families and was below the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Minneapolis MSA

The bank exhibits a poor borrower distribution of small loans to businesses. The proportion of bank loans to businesses with revenues less than \$1 million was significantly below the percentage of small businesses and well below the aggregate industry distribution of loans to those businesses

Small Loans to Farms

Refer to Table 12 in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Minneapolis MSA

The bank exhibited an excellent borrower distribution of small loans to farms. The proportion of bank loans to farms with revenues less than \$1 million was near to the percentage of farms and exceeded the aggregate industry distribution of loans to those borrowers.

Community Development Lending

The institution was a leader in providing CD loans. CD lending had a significantly positive impact on the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Minneapolis MSA

The bank made an excellent level of CD loans. During the evaluation period, ONB originated 47 CD loans totaling \$221.9 million. CD loan volume was equivalent to 53.4 percent of allocated tier 1 capital. The bank showed responsiveness with 48.9 percent of loans in economic development. The bank's CD loans demonstrated some leadership and complexity.

The following are examples of CD loans the bank originated or purchased in the MSA:

- ONB provided a \$9.8 million development loan to support the development of a six-story 223-unit multifamily housing complex. The development will designate 20 percent of its units for households earning no more than 50 percent of the Area Median Income, directly addressing the need for affordable housing in the region. The project qualifies for the City's 4D program, which offers a 40 percent reduction in property taxes for developments that maintain at least 20 percent of units at or below 60 percent AMI.
- ONB provided a \$1.9 million community development loan to finance the purchase of a new building located in a low-income, majority-minority-majority census tract. The building will be used to provide holistic, culturally responsive transformation for young African American men experiencing inequity at the intersection of race, ethnicity, and poverty. The funds will be used to help participants achieve outcomes such as stable housing, increased educational attainment, career acquisition and retention, family reconnection, elimination of criminal justice system involvement and addressing emotional and social traumas.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. See the *Lending in Assessment Area* section for details on loan programs and loan volumes.

Minnesota State Housing

Minnesota Housing offers a variety of loan programs for first-time and repeat homebuyers. The program includes downpayment and closing cost assistance programs. During the evaluation period, the bank originated 65 loans totaling \$14.0 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of Minnesota section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Mankato MSA and Minneapolis Non-MSA was stronger than the bank's overall performance under the Lending Test in the full-scope area. Performance for the Mankato MSA and Minnesota Non-MSA was stronger due to higher proportion of loans compared to the demographic and aggregate comparisons for geographical distribution of home mortgage loans and borrower distribution of small loans to businesses. Performance in the limited-scope AAs had a positive impact on the Lending Test rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Minnesota is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA was excellent.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Assessment Area	2022-2024									
	Prior Period		Current Period		Total			Unfunded Commitments		
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Mankato MSA	4	6,549	12	1,217	16	2.1	7,766	1.5	0	0
Minneapolis MSA	341	61,855	440	51,727	781	96.1	113,582	94.5	0	0
Minnesota Non-MSA	4	4,200	10	350	14	1.7	4,550	3.8	0	0
Broader Statewide or Regional Area	1	242	0	0	1	0.1	242	0.2	0	0
Total	350	72,846	462	53,294	812	100.0	126,140	100.0	0	0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution had an excellent level of qualified investments, including grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. In total, the bank had 781 qualified investments for \$113.5 million. The dollar volume of current and prior period investments represented 27.3 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume, 71.2 percent of investments supported affordable housing, 25.8 percent supported community services, 2.7 percent promoted economic development, and 0.3 percent funded revitalization and stabilization efforts.

The following are examples of qualified investments in the AA:

- A \$9.4 million NMTC investment supporting the redevelopment and expansion of an organization’s facility that provides community services in the AA. The investment will provide essential services to an underserved population, support the revitalization of a distressed area, and promote economic development in the area.
- Grants and sponsorships totaling \$72,500 to an organization that works to attract small businesses to underinvested neighborhoods in the city, which promotes economic development. The organization focuses on recruiting small businesses to the area by providing low-cost, flexible capital and connecting investors to entrepreneurs.
- A \$10,000 grant to a community service organization providing services to low-income individuals. The grant supported a program providing workforce development and skill training in the field of information technology. The program served 100 low-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Mankato MSA and Minnesota Non-MSA was consistent the bank’s overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank’s performance under the Service Test in Minnesota is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank’s performance in the Minneapolis MSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’s AA.

													2024	
Assessment Area	Deposits	Branches							Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
Mankato MSA	1.4	1	3.2	0.0	100.0	0.0	0.0	0.0	0.0	0.0	30.9	63.1	6.0	0.0
Minneapolis MSA	94.3	28	90.3	3.6	32.1	42.9	21.4	0.0	5.4	20.1	44.5	29.2	0.8	

Minesota Non-MSA	4.3	2	6.5	0.0	0.0	100.0	0.0	0.0	0.0	15.6	84.4	0.0	0.0
Total	100.0	31	100.0										
<i>Source: FFIEC File – 2020 U.S. Census 1/1/2022 – 12/31/2024 Bank Data Due to rounding, totals may not equal 100.0%</i>													

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Minneapolis MSA

The branch distribution was readily accessible to geographies and individuals of all income levels. When determining our conclusions, we gave more weight to performance in moderate-income CTs due to the small percentage of the population residing in low-income CTs. The bank had 28 retail branch locations in the Minneapolis MSA. The proportion of bank branches in low-income CTs was below the percentage of the population in those geographies. The proportion of bank branches in moderate-income CT exceeded the percentage of the population in those geographies.

The bank complements its traditional delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking located in LMI geographies. The bank operates 29 deposit-taking ATMs in the AA, of which nine were in LMI geographies.

The bank did not open or close any branches in the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Community Development Services

The institution was a leader in providing CD services.

Bank employees contributed a total of 2,411 hours on 1,218 instances to organizations supporting LMI individuals across the AA and geographies. This includes bank employees providing technical assistance, financial literacy, training and serving on boards and committees to organizations that promote economic development, affordable housing and community service and revitalization.

The following are examples of CD services in this AA:

- A bank employee serving in a leadership role provided technical assistance to an organization who partners with corporate, civic and philanthropic leaders who promote racial equity for affordable housing, rental housing, entrepreneurship and commercial development for LMI CTs.
- A bank employee serving on the board provided technical assistance for affordable housing to an organization that empowers minority real estate professionals to promote fair housing, build generational wealth, and expand opportunities for LMI communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Service Test in the Mankato MSA was consistent with the bank’s overall performance, and was excellent, under the Service Test in the full-scope area. Based on limited-scope reviews, the bank’s performance under the Service Test in the Minnesota Non-MSA was weaker than the bank’s overall performance under the Service Test in the

full-scope area. Weaker performance was due to its branches not being in either an LMI CT. Limited-scope performance had a neutral impact on the overall rating.

State Rating

State of Tennessee

CRA rating for the State of Tennessee¹¹: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness.
- The bank exhibited poor geographic distribution of loans.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The institution was a leader in making CD loans. CD lending in the Nashville AA had a positive impact on the Lending Test rating.
- The institution had an excellent level of qualified investments, including grants.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Tennessee

ONB had four AAs in the state of Tennessee: Chattanooga-Cleveland-Dalton, TN-GA-AL CSA (Chattanooga CSA), Knoxville-Morristown-Sevierville, TN MSA (Knoxville MSA), Nashville-Davidson-Murfreesboro, TN MSA (Nashville MSA) and Tennessee Non-MSA. For the Tennessee Non-MSA, all Non-MSA counties were combined and analyzed as one AA. The Nashville MSA received a full-scope review. The Tennessee rating area is new to the bank via an April 1st, 2024, merger with CapStar Bank. The remaining AAs received limited-scope reviews. The AAs meet the requirements of the regulation and do not arbitrarily exclude LMI CTs. The bank's operations in Tennessee comprised of 5.1 percent of total bank deposits. The AAs meets the requirements of the regulation and do not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

¹¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Nashville MSA

The Nashville MSA is comprised of five whole counties: Cannon, Davidson, Rutherford, Sumner and Williamson. As of the 2020 U.S. Census, the Nashville MSA contained 331 CTs, of which, 5.7 percent were designated as low-income CT's, 23.0 percent as moderate-income CTs, 37.5 percent middle-income CTs, and 31.1 percent upper-income CTs, and the remaining 2.7 percent had no income designated as unknown income CTs.

The populations of the Nashville MSA as reported through the 2020 U.S. Census was 1,515,883 of which 4.9 percent are low-income households and 20.6 percent are moderate-income households.

As of June 30, 2024, the bank had \$964.2 million in deposits in the Nashville MSA, representing 2.4 percent of the bank's total deposits. During the evaluation period, the bank made \$230.5 million or 2.2 percent of its total dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated seven full-service branches and seven deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 58 FDIC-insured institutions operating 452 branches in the AA. The bank ranked 12th in deposit market share with 1.2 percent. The top five competitors by deposit market share are Pinnacle Bank, Bank of America, N.A., Regions Bank, Truist Bank and First Horizon Bank. The top five banks hold a combined 66.0 percent of market share.

According to Moody's Analytics report as of August 2025, the Nashville MSA area's strengths include favorable business tax structure, strong demographics including a large pool of talent and healthy net migration, and a large concentration of prime-age workers. Weaknesses include decreasing affordability within the state, and a low concentration of innovative technology-producing industries. Major employment industries include professional and business services, education and health services, leisure and hospitality services, government and retail trade. Major employers include Vanderbilt University Medical Center, HCA Inc., Nissan North America, Inc., Sait Thomas Health Services and Amazon.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Nashville MSA ranged from 2.8 to 3.2 percent in January 2022, mostly increasing to 3.0 to 3.6 percent in December 2024. During the same period, the broader Tennessee statewide unemployment levels were at 3.7 percent and 3.5 percent during the same evaluation period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2024 U.S. Census, 7.9 percent of families in the Nashville MSA are below the federal poverty level.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 10.7 percent, with the number of housing units in the AA representing 605,979 at the end of the evaluation period. Of that amount, 351,518 are owner-occupied, while 208,196 are occupied rental units, and 46,265 units sit vacant, representing 58.0 percent, 34.4 percent, and 7.6 percent of total housing units, respectively. The median housing value of housing units for the Nashville MSA was \$246,100 at the end of the evaluation period.

The OCC evaluated the difference between the median income of families in the AA and the cost of housing. Low-income families earned less than \$4,238 within the AA, while moderate-income families earned from \$4,238 to \$6,780 within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant’s income. For the evaluation period, the calculated maximum affordable monthly mortgage payment a low-income borrower could reasonably afford is \$1,271 and a moderate-income person could reasonably afford a maximum monthly mortgage payment of \$2,034. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$1,637. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for a mortgage loan at the median housing value within the AA.

The OCC utilized two community contacts for this evaluation, which were conducted in 2023 and 2024. One of the organizations partners with several organizations to help people with free financial counseling services that move from a state of instability to a state empowerment with new savings habits, higher credit scores and lower debt burdens. This organization noted that smaller dollar lending is the largest need for LMI consumers in this area and that fintech’s like Chime, Cash App Bank and prepaid cards from employers are reaching these individuals instead of larger banks. The contact also noted that education to LMI consumers regarding the small business side of things are also needed. The second organization is a non-profit whose mission is to create affordable housing and notes that this is a significant concern for this area. This organization noted that most banks have been proactive in seeking out community development projects and lending in LMI communities and to LMI individuals both directly and indirectly.

Nashville MSA

Assessment Area(s) - Nashville MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	331	5.74	22.96	37.46	31.12	2.72
Population by Geography	1,515,883	4.93	20.62	38.80	34.52	1.13
Housing Units by Geography	605,979	5.36	22.06	38.60	32.98	1.00
Owner-Occupied Housing by Geography	351,518	2.27	16.36	41.12	39.72	0.53
Occupied Rental Units by Geography	208,196	10.18	31.22	34.98	21.98	1.64
Vacant Units by Geography	46,265	7.16	24.17	35.73	31.25	1.70
Businesses by Geography	69,715	4.02	20.03	30.77	42.18	3.01
Farms by Geography	1,938	2.27	16.98	37.20	42.16	1.39
Family Distribution by Income Level	355,588	19.48	16.85	20.64	43.03	0.00
Household Distribution by Income Level	559,714	21.36	16.94	18.72	42.98	0.00
Unemployment rate (%)	4.08	7.05	5.15	4.43	2.60	4.63
Households Below Poverty Level (%)	10.69	28.98	16.46	8.95	5.74	19.40
Median Family Income (34980 - Nashville-Davidson--Murfreeseboro--Franklin, TN MSA)		\$81,652		Median Housing Value		\$246,100
Median Family Income (34980 - Nashville-Davidson--Murfreeseboro--Franklin, TN MSA) for 2024		\$101,700		Median Gross Rent		\$1,164
				Families Below Poverty Level		7.93
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Tennessee

All performance in the Tennessee rating area is for the time period April 1st, 2024, through December 31st, 2024, only. We did a full-scope review on the bank’s Nashville MSA rating area. We selected the Nashville MSA as a full-scope due to it holding 47.2 percent of the statewide deposits. Additionally, the Nashville MSA had 65.8 percent of all HMDA, small business, and small loan originations in Tennessee.

For the Lending Test geographical and borrower distribution of loans, we gave the most weight to home mortgage performance. We gave the most weight to home mortgage performance due to the fact it had 75.5 percent of all HMDA, small business, and small originations in Tennessee. For the Lending Test small loans to business there was no 2024 aggregate data available at the time of this evaluation. Therefore, we did not conduct a lending activity analysis of small business loans and conclusions for geographical and borrower distribution of small loans to businesses were based on performance compared to just the demographic.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

The bank’s performance under the Lending Test in Tennessee is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Reviews

Based on Full-Scope Reviews, the bank’s performance in the Nashville MSA was adequate.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Table 3: Lending Activity								2022-2024	
Number of Loans									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Chattanooga CSA	24	37	0	0	NA	61	8.0	4.6	
Knoxville MSA	5	3	0	0	NA	8	1.1	1.4	
Nashville MSA	412	85	1	2	NA	500	66.0	47.2	
Tennessee Non-MSA	130	52	7	0	NA	189	24.9	46.8	
Total	571	177	8	2	NA	758	100.0	100.0	
Dollar Volume of Loans (\$000s)									
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits	
Chattanooga CSA	17,383	10,761	0	0	NA	28,144	8.7	4.6	
Knoxville MSA	1,788	925	0	0	NA	2,713	0.8	1.4	
Nashville MSA	207,301	23,213	25	24,391	NA	254,930	79.0	47.2	
Tennessee Non-MSA	25,869	10,147	1,039	0	NA	37,055	11.5	46.8	
Total	252,341	45,046	1,064	24,391	NA	322,842	100.0	100.0	
<i>Source: 1/1/2022 – 12/31/2024 Bank Data.</i>									
<i>Due to rounding, totals may not equal 100.0%</i>									

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Nashville MSA

According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$964.2 million in deposits in the Nashville MSA. The bank deposits were equivalent to a 1.2 percent deposit market share in the AA. The bank deposit market share ranked 12th out of 58 deposit taking institutions. The bank market share ranking was in the top 20.7 percent.

According to 2024 peer HMDA data, the bank made 412 mortgage loans totaling \$208.0 million. The bank's HMDA originations were equivalent to 0.9 percent market share of HMDA originations. The bank's market share of HMDA originations was below its deposit market share. The bank's market share of HMDA originations ranked 30th out of 760 home mortgage lenders in the AA. The bank's market share ranking was in the top 4.0 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table 7 in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Nashville MSA

The geographical distribution of home mortgages was poor. The proportion of bank home mortgage loans in low-income CTs was somewhat near to the percentage of owner-occupied housing and well below the aggregate industry distribution of loans to those geographies. The proportion of bank loans in moderate-income CTs was well below both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

Refer to Table 9 in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Nashville MSA

The geographic distribution of small loans to businesses was good. The proportion of bank small loans to businesses in low-income CTs was near to the percentage of businesses in those geographies. The proportion of bank loans in moderate-income CTs was below the percentage of businesses in those geographies.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Nashville MSA

The borrower distribution of home mortgage loans was good. Examiners considered the high cost of housing and determined that low-income borrowers would be challenged to afford a home at the median home value. Therefore, more weight was given to the aggregate distribution of loans to low-income borrowers. The proportion of bank home mortgage loans to low-income borrowers was significantly below the percentage of families and below the aggregate industry distribution of loans to those borrowers. The proportion of bank loans to moderate-income borrowers was near to the percentage of families and approximated the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Nashville MSA

The borrower distribution of small loans to businesses was very poor. The proportion of bank loans with revenues less than \$1.0 million was significantly below the percentage of businesses.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact on the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Nashville MSA

The bank made an excellent level of CD loans. During the evaluation period, ONB originated two CD loans totaling \$24.4 million. This equated to 21.5 percent of allocated tier 1 capital. The bank loans were responsive to economic development and for revitalization and stabilization needs in the community.

The following are examples of CD loans the bank originated or purchased in the MSA:

- The bank originated a \$23.1 million to finance a critical retail hub for surrounding neighborhoods, including LMI geographies. The retail hub will be used to provide continued

access to affordable grocery options and essential goods for residents, which is particularly important households that rely on proximate retail services.

- The bank provided \$1.4 million SBA 7(a) loan financing small business growth and job retention. The financing package includes a 7(a) loan for the acquisition and an SBA Express line of credit for post-closing working capital needs. Each location employs approximately 4-5 individuals, creating and sustaining jobs accessible to residents. These positions are likely held by low- or moderate-income individual.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. See the *Lending in Assessment Area* section for details on loan programs and loan volumes.

Conclusions for Area Receiving Limited-Scope Review

Refer to Tables 7 through 14 in the state of Tennessee section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope review, the bank’s performance under the Lending Test in the Chattanooga MSA and Knoxville MSA was consistent with the bank’s overall performance under the Lending Test in the full-scope area. Based on limited-scope review, the bank’s performance under the Lending Test in the Tennessee Non-MSA was stronger than the bank’s overall performance under the Lending Test in the full-scope area. Stronger performance is due to higher proportion of bank loans in LMI geographies for both home mortgage and small business loans. Performance in the limited-scope AAs had a neutral impact on the Lending Test rating.

INVESTMENT TEST

The bank’s performance under the Investment Test in Tennessee is rated Outstanding.

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank’s performance in the Nashville MSA was excellent.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
	Chattanooga CSA	0	0	3	23	3	2.8	23	0.1	0
Knoxville MSA	0	0	5	1,337	5	4.6	1,337	1.9	0	0
Nashville MSA	9	3,575	68	5,517	77	71.3	9,092	12.7	0	0
Tennessee Non-MSA	0	0	15	56,341	15	13.9	56,341	78.8	0	0
Broader Statewide and Regional	8	4,668	0	0	8	7.4	4,668	6.5	0	0
Total	17	8,243	91	63,218	108	100.0	71,461	100.0	0	0

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Nashville MSA

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors. In total, the bank had 68 qualified current period investments totaling \$56.3 million. The bank also had nine prior period investments totaling \$3.5 million still outstanding at the end of the current evaluation period. The dollar volume of current and prior period investments represented 8.0 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume, 77.8 percent of investments supported affordable housing, 2.2 percent supported community services, and 20.0 percent promoted economic development.

The following are examples of qualified investments in the AA:

- Sixteen investments in MBS totaling \$4.0 million, which primarily benefitted LMI people. These investments supported affordable housing in the AA.
- A \$10,000 donation to an organization providing assistance to LMI individuals. The organization assists single working mothers who face unexpected hardships that threaten housing stability and access to childcare.
- A \$12,500 donation to an affordable housing organization. The organization constructs homes and then sells the homes at no profit to the organization to partner families, offering affordable monthly mortgage terms to LMI people.

Broader Statewide or Regional Area

In addition, the bank made eight investments during the prior period with remaining book balances of \$4.7 million in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AA. The broader statewide and regional area investment further supported the overall Investment Test conclusion.

Conclusions for Area Receiving Limited-Scope Review

Based on limited-scope, the bank's performance under the Investment Test in the Chattanooga MSA and Tennessee Non-MSA was weaker than the bank's overall performance under the Investment Test in the full-scope area. Weaker performance was due to smaller percentage of qualified CD investments compared to allocated tier 1 capital. Based on limited-scope, the bank's performance under the Investment Test in the Knoxville MSA was consistent with the bank's overall performance under the Investment Test in the full-scope area. Performance in the limited-scope AAs had a neutral impact on the Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Tennessee is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Nashville MSA was adequate.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution’s AA.

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits		Branches						Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Chattanooga CSA	4.6	2	9.1	0.0	50.0	50.0	0.0	0.0	6.6	13.8	47.1	31.9	0.6
Knoxville MSA	1.4	1	4.5	0.0	0.0	0.0	100.0	0.0	7.8	11.4	38.2	40.0	2.6
Nashville MSA	47.2	7	31.9	0.0	14.3	14.3	71.4	0.0	4.9	20.6	38.8	34.5	1.2
Tennessee Non-MSA	46.8	12	54.5	0.0	25.0	41.7	33.3	0.0	0.0	12.5	66.4	21.1	0.0
Total	100.0	22	100.0										

Source: FFIEC File – 2020 U.S. Census
1/1/2022 – 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Nashville MSA

The branch distribution was reasonably accessible to geographies and individuals of different income levels. The bank had seven retail branch locations in the Nashville MSA. The proportion of bank branches in low-income CTs was significantly below the percentage of the population in those geographies. The proportion of bank branches in moderate-income CTs was below the percentage of the population in those geographies.

The bank did not open or close any branches throughout the evaluation period.

The bank complements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking located in LMI geographies. The bank operates seven deposit-taking ATMs in the AA, of which two were in a LMI geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA, particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Community Development Services

The institution provided an adequate level of CD services. When arriving at this conclusion, examiners considered the fact that this rating area was new to the bank in 2024 and had less than one year of activity.

Bank employees provided a total of 11 hours on four instances to affordable housing and community services organizations supporting LMI individuals across the AA and geographies. Bank employees provided technical assistance and financial literacy training.

The following are examples of CD services in this AA:

- A bank employee provided financial literacy training to LMI individuals through a housing authority organization that supports affordable housing opportunities in moderate-income CT and surrounding communities.
- A bank employee provided support to an organization that supports low-income families by creating long-term mentorship, mental and emotional development, leadership education and entrepreneurship. The bank employee provided technical assistance and attended the organization's Board meeting event.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Chattanooga MSA and Tennessee Non-MSA was stronger than the bank's overall performance under the Service Test in the full-scope areas. Stronger performance was due to a higher percentage of branches located in moderate-income CTs. Based on limited-scope reviews, the bank's performance under the Service Test in the Knoxville MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas. The bank did not have any branches in LMI CTs. Performance in Limited-scope AAs had a neutral impact the overall rating.

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin¹²: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness.
- The bank exhibited a good geographic distribution of loans.
- The bank exhibited a poor distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.
- The bank made extensive use of innovative and flexible loan products. Innovative and flexible loan products had a significantly positive impact on the Lending Test rating. Performance in the limited-scope AAs had a positive impact on the Lending Test rating.
- The institution had an excellent level of qualified investments, including grants.
- Branch delivery systems were readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Wisconsin

ONB had four AAs in the state of Wisconsin: Appleton-Oshkosh-Neenah, WI CSA (Appleton CSA), Madison-Janesville-Beloit, WI CSA (Madison CSA), Milwaukee-Racine-Waukesha, WI, CSA (Milwaukee CSA) and the Wisconsin Non-MSA. For the Wisconsin Non-MSA, all Non-MSA counties were combined and analyzed as one AA. The Milwaukee CSA received a full-scope review. The remaining AAs received limited-scope reviews. The bank's operations in Wisconsin comprised of 7.1 percent of total bank deposits. The AAs meet the requirements of the regulation and do not arbitrarily exclude LMI CTs. See appendix A for a list of the counties.

Milwaukee CSA

¹² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The Milwaukee CSA consists of Racine, Milwaukee, and Waukesha counties. As of the 2020 U.S. Census, the Milwaukee CSA contained 400 CTs, of which, 20.3 percent were designated as low-income CTs, 19.8 percent as moderate-income CTs, 30.3 percent middle-income CTs, 27.5 percent upper-income CTs, and the remaining 2.3 percent had no income designated.

The Milwaukee CSA had a population of 1,346,467 of which 15.0 percent are low-income households and 18.3 percent are moderate-income people.

As of June 30, 2024, the bank had \$1.4 billion in deposits the Milwaukee CSA, representing 3.5 percent of the bank's total deposits. During the evaluation period, the bank made \$811.9 million or 7.8 percent of its total dollar volume of HMDA and CRA small business and small farm loan originations within the AA.

The bank operated six full-service branches and six deposit taking ATMs within this AA. According to the June 30, 2024, FDIC deposit-market share report, there were 40 FDIC-insured institutions operating 363 branches in the AA. The bank ranked eighth in deposit market share with 2.1 percent. The top five competitors by deposit market share in the AA are U.S. Bank N.A., BMO Bank N.A., JP Morgan Chase Bank, N.A., Associated Bank, N.A., and Town Bank, N.A. The top five banks hold a combined 73.4 percent of market share.

According to Moody's Analytics report as of October 2025, the Milwaukee CSA strengths include a highly productive manufacturing sector above-average per capita income and a well-educated workforce. Weaknesses include a negative net migration, stall in population, an above average exposure to interest rates through manufacturing and labor challenges across all major industries. Major employment industries include education and health services, professional and business services, manufacturing, government and leisure and hospitality services. Major employers include Milwaukee Electric Tool Corp., Kohl's Corp, UWM Sheldon B Lubar School of Business, Milwaukee Mitchell International and Rockwell Automation.

According to the Bureau of Labor Statistics, the non-seasonally adjusted unemployment rate for the Milwaukee CSA was 3.5 percent in January 2022 and 3.0 percent in December 2024. During the same period, the broader Wisconsin statewide unemployment rates were at 3.5 percent and 3.9 percent.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty levels. According to the 2024 U.S. Census, 9.9 percent of families in the Milwaukee CSA are below the federal poverty level.

According to the 2020 U.S. Census demographic data, households below the poverty level represented 13.6 percent, with the number of housing units in the AA representing 586,013 at the end of the evaluation period. Of that amount, 310,203 are owner-occupied, while 233,280 are occupied rental units, and 42,530 units are vacant, representing 52.9 percent, 40.0 percent, and 7.1 percent of total housing units, respectively. The median housing value of housing units for the Milwaukee CSA was \$161,850 at the end of the evaluation period.

The OCC evaluated the disparity between the median income of families within the AA and the cost of housing. Low-income families earned less than \$4,254 a month within the AA, while moderate-income

families earned from \$4,254 to \$6,807 a month within the AA. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant’s income. For the evaluation period, the calculated maximum affordable monthly mortgage payment of \$1,276 for a low-income borrower and from \$2,042 for a moderate-income borrower within the AA. Assuming a 30-year mortgage with a 7.0 percent interest rate, and not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home in the AA using the median housing value would be \$1,077. Based on these calculations, some low-income would be challenged to qualify for a mortgage loan at the median housing value within the AA.

The OCC utilized one community contact for this evaluation conducted in 2024. The first organization is a non-profit whose primary purpose is to improve metro Milwaukee as a place to invest capital, grow business and create jobs. The contact noted there have been modest declines in unemployment, but that unemployment continues to lag and there is not a lot of population growth. The second contact is also a non-profit that provides existing and new businesses with the supplemental services to expand, relocate, finance or recruit talent.

Milwaukee CSA

Assessment Area(s) - Milwaukee-Racine-Waukesha CSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	400	20.25	19.75	30.25	27.50	2.25
Population by Geography	1,346,467	14.97	18.25	31.96	33.59	1.23
Housing Units by Geography	586,013	14.75	18.74	33.64	31.77	1.10
Owner-Occupied Housing by Geography	310,203	6.65	14.68	35.84	42.60	0.22
Occupied Rental Units by Geography	233,280	22.57	24.03	32.36	19.13	1.97
Vacant Units by Geography	42,530	30.89	19.33	24.61	22.12	3.04
Businesses by Geography	49,051	12.87	18.51	31.28	36.45	0.88
Farms by Geography	1,146	11.17	11.95	30.80	45.90	0.17
Family Distribution by Income Level	322,061	24.34	17.00	19.94	38.72	0.00
Household Distribution by Income Level	543,483	26.45	15.95	17.33	40.23	0.00
Unemployment rate (%)	4.45	9.20	6.25	3.24	3.03	5.38
Households Below Poverty Level (%)	13.63	35.25	17.90	9.31	5.82	46.77
Median Family Income (33340 - Milwaukee-Waukesha, WI MSA)		\$84,825		Median Housing Value		\$161,850
Median Family Income (33340 - Milwaukee-Waukesha, WI MSA) for 2024		\$102,100		Median Gross Rent		\$911
				Families Below Poverty Level		9.88
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Wisconsin

We conducted a full-scope review of the Milwaukee CSA. The Milwaukee CSA had 49.4 percent of statewide deposits. Additionally, the Milwaukee CSA loan originations represent 32.7 percent and 78.0 percent of all HMDA and small business loan originations, respectively.

For the Lending Test, we gave more weight to the performance of home mortgage lending due to it accounting for 74.5 percent of all HMDA and small business loan originations in Wisconsin.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

The bank's performance under the Lending Test in Wisconsin is rated High Satisfactory. CD lending had a significantly positive impact on the Lending Test rating. Performance in the limited-scope AAs had a positive impact on the Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Milwaukee CSA was adequate.

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Appleton CSA	297	16	0	4	NA	317	11.6	8.3
Madison CSA	848	115	0	5	NA	968	35.6	36.6
Milwaukee CSA	648	529	0	50	NA	1,227	45.1	49.4
Wisconsin Non-MSA	190	19	0	1	NA	210	7.7	5.7
Total	1,983	679	0	60	NA	2,722	100.0	100.0
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Appleton CSA	52,133	3,287	0	2,694	NA	58,114	4.0	8.3
Madison CSA	288,461	34,808	0	39,039	NA	362,308	24.8	36.6
Milwaukee CSA	624,051	187,855	0	186,488	NA	998,394	68.3	49.4
Wisconsin Non-MSA	34,939	6,555		513	NA	42,007	2.9	5.7
Total	999,584	232,505	0	228,734		1,460,823	100.0	100.0

Source: 1/1/2022 – 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only

According to June 30, 2024, FDIC Summary of Deposit Reports, the bank had \$1.4 billion in deposits in the Milwaukee CSA. The bank deposits were equivalent to a 2.1 percent deposit market share in the AA. The bank deposit market share ranked eighth out of 40 deposit taking institutions. The bank market share ranking was in the top 20.0 percent.

According to 2024 peer HMDA data, the bank made 187 mortgage loans totaling \$94.8 million. The bank's HMDA originations were equivalent to 0.6 percent market share of HMDA originations. The bank's market share of HMDA originations was significantly below its deposit market share. The bank's market share of HMDA originations ranked 37 out of 463 home mortgage lenders in the AA. The bank's market share ranking was in the top 8.0 percent of all HMDA lenders in the AA. The bank's market share ranking of HMDA originations, relative to all HMDA lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

According to 2023 small business data, the bank made 156 loans totaling \$54.4 million. The bank's small business loan originations were equivalent to 0.5 percent market share in the AA. The bank's market share of small business loan originations was significantly below its deposit market share. The bank's market share of small business loan originations ranked 21st out of 124 small business lenders. The bank's market share ranking, relative to all lenders, ranked in the top 16.9 percent of all lenders. The bank's market share ranking, relative to all lenders, was stronger than its deposit market share ranking, relative to all deposit taking institutions.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table 7 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Milwaukee CSA

The geographic distribution of home mortgage loans was good. The proportion of the bank's home mortgage loans in low-income CTs was near to the percentage of owner-occupied housing and below the aggregate industry distribution of loans to those geographies. The proportion of the bank's loans to moderate-income CTs was near to both the percentage of owner-occupied housing and the aggregate industry distribution of loans to those geographies.

Small Loans to Businesses

Refer to Table 9 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Milwaukee CSA

The geographical distribution of small loans to businesses was good. The proportion of the bank's small loans to businesses in low-income CTs was well below the percentage of businesses and near to the aggregate industry distribution of loans to those geographies. The proportion of the bank's small loans to businesses in moderate-income CTs exceeded both the percentage of businesses and the aggregate industry distribution of loans to those businesses.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed home mortgage and small business lending data. We did not identify any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a poor distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table 8 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Milwaukee CSA

The bank exhibits an adequate borrower distribution of home mortgage loans. The proportion of the bank's home mortgage loans to low-income borrowers was significantly below the percentage of families and below the aggregate industry distribution of loans to those borrowers. The proportion of bank loans to moderate-income borrowers was near to the percentage of families and below the aggregate industry distribution of loans to those borrowers.

Small Loans to Businesses

Refer to Table 10 in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Milwaukee CSA

The borrower distribution of small loans to businesses was very poor. The proportion of bank loans to businesses with revenues less than \$1.0 million was significantly below both the percentage of businesses and the aggregate industry distribution of loans to those businesses.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Milwaukee CSA

The bank made an excellent level of CD loans. During the evaluation period, ONB originated 50 CD loans totaling \$186.4 million. This equated to 113.2 percent of allocated tier 1 capital. The bank showed responsiveness with 42.0 percent of loans in economic development and 40.0 percent of loans in affordable housing.

The following are examples of CD loans the bank originated or purchased in the MSA:

- ONB provided \$2.1 million financing for the acquisition and renovation of a three-property, 32-unit multifamily portfolio. The portfolio offers naturally occurring affordable housing, with rents currently below HUD Fair Market Rent. All properties are situated within a low-income census tract, supporting the preservation and enhancement of affordable housing in the community.

- ONB provided a \$1.6 million loan to finance the construction and development of a freestanding retail building. The project is in a moderate-income census tract and supports economic development through job creation and increased access to retail services.
- ONB provided a \$1.8 million CD loan to support the construction of a 2,443 square foot retail commercial building located within a moderate-income census tract. The development includes a diverse mix of commercial and residential spaces with one location expected to generate employment opportunities for 12 to 15 full-time and 8 to 10 part-time workers, supporting job creation in a moderate-income area.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. See “Lending in Assessment Area” section for details on loan programs and loan volumes.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 10 in the state of Wisconsin section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Appleton CSA was consistent with the bank’s overall performance under the Lending Test in the full-scope area. Based on limited-scope reviews, the bank’s performance under the Lending Test in the Madison CSA and Wisconsin Non-MSA was stronger than the bank’s overall performance under the Lending Test in the full-scope area. Stronger performance in the Madison CSA is due to a larger percentage of bank home mortgage loans compared to the aggregate and demographics for borrower distribution. Stronger performance in the Wisconsin Non-MSA is due to higher proportion of bank loans compared to the demographic and aggregate for geographical and borrower distribution of home mortgage loans. Performance in the limited-scope AAs had a positive impact on the Lending Test rating.

INVESTMENT TEST

The bank’s performance under the Investment Test in Wisconsin is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Milwaukee CSA was excellent.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Appleton CSA	22	1,528	48	3,009	70	12.7	4,537	4.6	0	0
Madison CSA	79	16,061	87	33,212	166	30.1	49,273	50.3	0	0
Milwaukee CSA	107	15,979	183	25,656	290	52.5	41,635	42.5	2	802
Wisconsin Non-MSA	6	1,069	16	754	22	4.0	1,823	1.9	0	0
Broader Statewide and Regional	0	0	4	773	4	0.7	773	0.8	0	0
Total	214	34,637	338	63,404	552	100.0	98,041	100.0	2	802

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Milwaukee CSA

The institution had an excellent level of qualified investments, including grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current and prior period investments represented 25.1 percent of allocated tier 1 capital. Additionally, there were two unfunded commitments totaling \$802,796 in the AA.

The institution exhibited excellent responsiveness to credit and community development needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume, 47.2 percent of investments supported affordable housing, 42.3 percent supported community services, 10.4 percent promoted economic development, and 0.1 percent funded revitalization/stabilization efforts. The following are examples of qualified investments in the AA:

- A \$10.9 million NMTC investment to a community service organization. The organization supports LMI women, providing mental health treatment, vocational and educational services, as well as recovery services. This investment supported the expansion of the facility and will allow the organization to increase from 35 to 100 beds.
- A \$5.9 million NMTC investment to support the expansion of a private school that primarily supports low-income students, with 87 percent of students qualifying for free or reduced lunch. The expansion will increase the student capacity from 1,500 students to 2,400 students.
- A \$1.0 investment and a \$30,000 grant to an organization supporting affordable housing. The organization provides pre- and post-homeownership counseling, downpayment assistance programs, and lending services to LMI first-time homebuyers.

Broader Statewide or Regional Area

In addition, the bank made four investments totaling \$773,066 in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AA. The broader statewide and regional area investment further supported the overall Investment Test conclusion.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Appleton CSA, Madison CSA, and Wisconsin Non-MSA AAs was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Performance in the limited-scope AAs further supported the overall Investment Test rating.

SERVICE TEST

The bank’s performance under the Service Test in Wisconsin is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Milwaukee CSA was excellent.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution’s AA.

Table 5: Distribution of Branch Delivery Systems													2024
Assessment Area	Deposits		Branches						Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Appleton CSA	8.3	3	13.0	0.0	33.3	66.7	0.0	0.0	1.5	16.4	61.7	18.3	2.1
Madison CSA	36.6	12	52.2	0.0	25.0	58.3	8.3	8.3	3.2	15.4	51.0	27.2	3.2
Milwaukee CSA	49.4	6	26.1	0.0	33.3	16.7	50.0	0.0	14.9	18.3	32.0	33.6	1.2
Wisconsin Non-MSA	5.7	2	8.7	0.0	50.0	50.0	0.0	0.0	0.0	3.6	55.7	40.7	0.0
Total	100.0	23	100.0										

Source: FFIEC File – 2020 U.S. Census
 1/1/2022 – 12/31/2024 Bank Data
 Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Milwaukee CSA

The branch distribution was readily accessible to essentially to geographies and individuals of different income levels. The bank had six retail branch locations in the Milwaukee CSA. The proportion of bank branches in low-income CTs was significantly below the percentage of the population in those geographies. The proportion of bank branches in moderate-income CTs exceeded the percentage of the population in those geographies. Examiners considered one branch as near to a low-income CT and provided additional access to the LMI populations in the AA. The bank provided maps and data that detailed they had branches within a half mile of a low-income CT and that the branch usage by LMI people was near to the percentage of LMI people in the AA.

Table 6: Distribution of Branch Openings/Closings							
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)				
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp	NA
Appleton CSA							
Madison CSA							
Milwaukee CSA	1	1					
Wisconsin Non-MSA							
Total							

1/1/2022-12/31/2024 Bank Data.

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches had not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened and closed a branch in an upper-income geography.

The bank complements its traditional service delivery methods with alternative retail delivery systems, such as deposit-taking ATMs, online banking, and mobile banking located in LMI geographies. The bank operates six deposit-taking ATMs in the AA, of which two were in a moderate-income geography. Examiners considered these services, as the bank provided supporting data to determine the impact on, or usage by, LMI individuals.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced its AA(s), particularly LMI geographies and/or individuals. All branches operate during similar banking hours.

Community Development Services

The institution provided a good level of CD services.

Bank employees provided a total of 1,026 hours on 335 instances to organizations supporting economic development, affordable housing and community services to LMI individuals across the AA and geographies. Bank employees served in a technical assistance, financial literacy and training capacity.

The following are examples of CD services in this AA:

- Bank employees provided financial literacy to a nonprofit organization who delivers financial education and wealth-building strategies that enhance the quality of life of low-and moderate-income youths, families and communities.
- A bank employee provided interview training support to an organization that provides essential soft skills such as teamwork, financial literacy, time management and conflict resolution in a moderate-income CT.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Appleton CSA, Madison CSA, and the Wisconsin Non-MSA was consistent with the bank's overall performance under the Service Test in the full-scope areas.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	1/1/2022 – 12/31/2024	
Bank Products Reviewed:	Home mortgage, small business, small farm, consumer loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSAs		
Chicago-Naperville-Elgin IL-IN CSA	Full-Scope	(IL) Cook, Dekalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, Will (IN) Lake
Davenport-Moline-Rock Island IA-IL MSA	Full-Scope	(IA) Scott, (IL) Rock Island
Evansville-Henderson IN-KY CSA	Full-Scope	(IN) Posey, Vanderburgh, Warrick (KY) Henderson
Louisville- Jefferson County KY-IN CSA	Full-Scope	(KY) Jefferson (IN) Clark
South Bend – Elkhart – Mishawaka IN-MI CSA	Full-Scope	(IN) Elkhart, St. Joseph (MI) Berrien
States		
Illinois		
Champaign MSA	Limited-Scope	Champaign
Danville MSA (2022-23)	Limited-Scope	Vermilion
Illinois Non-MSA	Full-Scope	Know, LaSalle, Vermilion
Indiana		
Bloomington MSA	Limited-Scope	Bloomington
Evansville MSA (2024)	Full-Scope	Posey, Vanderburgh, Warrick
Fort Wayne MSA	Limited-Scope	Fort Allen
Indianapolis-Carmel-Muncie CSA	Full-Scope	Bartholomew, Boone, Delaware, Hamilton, Hendricks, Johnson, Madison, Marion
Lafayette-West Lafayette MSA	Limited-Scope	Tippecanoe
Terre Haute MSA	Limited-Scope	Vermillion, Vigo
Indiana Non-MSA	Limited-Scope	Daviess, Dubois, Fountain, Gibson, Jackson, Jennings, Knox, Kuscusko, Lawrence, Martin, Orange, Perry, Putnam, Randolph, Spencer
Kentucky		
Lexington-Fayette MSA	Limited-Scope	Fayette
Kentucky Non-MSA	Limited-Scope	Henderson, Hopkins, Muhlenberg, Union
Owensboro	Full-Scope	Daviess
Michigan		
Detroit-Warren-Ann Arbor CSA	Full-Scope	Lenawee, Livingston, Monroe, Washtenaw
Grand Rapids-Wyoming-Kentwood MSA	Full-Scope	Kent, Ottawa
Jackson MSA	Limited-Scope	Jackson
Kalamazoo-Battle Creek-Portage CSA	Limited-Scope	Calhoun, Kalamazoo
Minnesota		
Mankato MSA	Limited-Scope	Blue Earth
Minneapolis-St. Paul-Bloomington MSA	Full-Scope	Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburn, Washington, Wright
Minnesota Non-MSA	Limited-Scope	Chippewa, Lac Qui Parle
Tennessee		

Chattanooga-Cleveland-Dalton CSA	Limited-Scope	Bradley, Hamilton
Knoxville MSA	Limited-Scope	Knox
Nashville-Davidson-Murfreesboro-Franklin MSA	Full-Scope	Cannon, Davidson, Rutherford, Sumner, Williamson
Tennessee Non-MSA	Limited-Scope	Coffee, Lawrence, McMinn, Monroe, Wayne
Wisconsin		
Appleton-Oshkosh-Neenah CSA	Limited-Scope	Outagamie, Winnebago
Madison-Janesville-Beloit	Limited-Scope	Dane, Rock
Milwaukee-Racine-Waukesha CSA	Full-Scope	Milwaukee, Racine, Waukesha
Wisconsin Non-MSA	Limited-Scope	Portage, Walworth

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
ONB	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
Chicago MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Davenport MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Evansville MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Louisville MMSA	High Satisfactory	Outstanding	Needs to Improve	Satisfactory
South Bend MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Illinois	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Indiana	Outstanding	Outstanding	Outstanding	Outstanding
Kentucky	High Satisfactory	High Satisfactory	Needs to Improve	Satisfactory
Michigan	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Minnesota	High Satisfactory	Outstanding	Outstanding	Outstanding
Tennessee	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Wisconsin	High Satisfactory	Outstanding	Outstanding	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): Loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a ‘male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2 of this title, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13) of this title.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a Core Based Statistical Area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of geography.

Multifamily: Refers to a residential structure that contains five or more units.

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multistate metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

Table 12. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Chicago MMSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Chicago MMSA 2023	4,257	1,448,172	100.00	418,747	4.63	2.42	4.55	18.56	13.93	17.30	37.83	36.67	37.73	38.64	46.68	40.08	0.34	0.31	0.34
Total	4,257	1,448,172	100.00	418,747	4.63	2.42	4.55	18.56	13.93	17.30	37.83	36.67	37.73	38.64	46.68	40.08	0.34	0.31	0.34

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Chicago MMSA 2024	2,010	479,658	100.00	182,879	4.63	4.53	4.72	18.86	18.81	17.77	37.07	39.35	36.77	39.10	36.87	40.38	0.33	0.45	0.35
Total	2,010	479,658	100.00	182,879	4.63	4.53	4.72	18.86	18.81	17.77	37.07	39.35	36.77	39.10	36.87	40.38	0.33	0.45	0.35

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data,
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Chicago MMSA 2023	4,257	1,448,172	100.00	418,747	23.08	9.35	9.91	16.80	16.98	21.87	19.35	21.24	21.36	40.78	45.45	30.32	--	6.98	16.54		
Total	4,257	1,448,172	100.00	418,747	23.08	9.35	9.91	16.80	16.98	21.87	19.35	21.24	21.36	40.78	45.45	30.32	--	6.98	16.54		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Chicago MMSA 2024	2,010	479,658	100.00	182,879	23.10	11.39	7.31	16.76	22.69	19.55	19.31	19.70	21.60	40.82	37.51	32.93	--	8.71	18.61		
Total	2,010	479,658	100.00	182,879	23.10	11.39	7.31	16.76	22.69	19.55	19.31	19.70	21.60	40.82	37.51	32.93	--	8.71	18.61		

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Chicago MMSA 2023	2,159	749,027	100.00	522,235	5.92	5.84	4.61	16.91	18.02	16.21	32.73	39.69	34.67	43.87	35.99	44.06	0.56	0.46	0.45		
Total	2,159	749,027	100.00	522,235	5.92	5.84	4.61	16.91	18.02	16.21	32.73	39.69	34.67	43.87	35.99	44.06	0.56	0.46	0.45		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Chicago MMSA 2024	924	315,717	100.00	--	5.89	6.71	--	17.26	19.48	--	32.44	38.42	--	43.92	34.96	--	0.49	0.43	--		
Total	924	315,717	100.00	--	5.89	6.71	--	17.26	19.48	--	32.44	38.42	--	43.92	34.96	--	0.49	0.43	--		

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Chicago MMSA 2023	2,159	749,027	100.00	522,235	80.30	31.08	54.68	11.32	65.08	8.38	3.84	
Total	2,159	749,027	100.00	522,235	80.30	31.08	54.68	11.32	65.08	8.38	3.84	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Chicago MMSA 2024	924	315,717	100.00	--	80.28	29.44	--	10.72	63.10	9.00	7.47	
Total	924	315,717	100.00	--	80.28	29.44	--	10.72	63.10	9.00	7.47	

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate		
Chicago MMSA 2023	136	28,692	100.00	2,197	4.34	--	1.96	17.48	5.15	8.28	39.64	86.76	55.76	38.10	8.09	33.68	0.44	--	0.32		
Total	136	28,692	100.00	2,197	4.34	--	1.96	17.48	5.15	8.28	39.64	86.76	55.76	38.10	8.09	33.68	0.44	--	0.32		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate		
Chicago MMSA 2024	72	15,930	100.00	--	4.41	--	--	18.47	4.17	--	38.76	84.72	--	38.07	11.11	--		
Total	72	15,930	100.00	--	4.41	--	--	18.47	4.17	--	38.76	84.72	--	38.07	11.11	--		

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Chicago MMSA 2023	136	28,692	100.00	2,197	88.84	61.03	59.04	9.54	37.50	1.62	1.47
Total	136	28,692	100.00	2,197	88.84	61.03	59.04	9.54	37.50	1.62	1.47

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Chicago MMSA 2024	72	15,930	100.00	--	89.31	68.06	--	9.15	31.94	1.54	--
Total	72	15,930	100.00	--	89.31	68.06	--	9.15	31.94	1.54	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Davenport MMSA

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-In come Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Davenport-Moline-Rock Island IA-IL MMSA 2024	152	18,664	100.00	25,893	1.10	--	0.62	18.97	23.68	20.11	55.34	50.00	54.72	24.51	26.32	24.39	0.08	--	0.14
Total	152	18,664	100.00	25,893	1.10	--	0.62	18.97	23.68	20.11	55.34	50.00	54.72	24.51	26.32	24.39	0.08	--	0.14

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Davenport-Moline-Rock Island IA-IL MMSA 2024	152	18,664	100.00	25,893	19.74	16.45	11.06	18.59	24.34	21.52	21.17	25.00	19.98	40.50	30.92	27.58	--	3.29	19.86
Total	152	18,664	100.00	25,893	19.74	16.45	11.06	18.59	24.34	21.52	21.17	25.00	19.98	40.50	30.92	27.58	--	3.29	19.86

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Davenport-Moline- Rock Island IA-IL MMSA 2024	62	19,363	100.00	9,833	2.47	11.29	1.98	22.53	32.26	23.79	44.34	33.87	43.90	26.80	22.58	27.93	3.86	--	2.40		
Total	62	19,363	100.00	9,833	2.47	11.29	1.98	22.53	32.26	23.79	44.34	33.87	43.90	26.80	22.58	27.93	3.86	--	2.40		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022 - 2024	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Davenport-Moline- Rock Island IA-IL MMSA 2024	62	19,363	100.00	9,833	83.13	16.13	55.58	4.29	83.87	12.59	--		
Total	62	19,363	100.00	9,833	83.13	16.13	55.58	4.29	83.87	12.59	--		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Evansville MMSA

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Evansville MMSA	1,031	163,093	100.00	18,676	5.16	5.33	4.61	18.10	14.55	19.62	43.08	38.41	39.01	33.47	41.32	36.67	0.19	0.39	0.09
Total	1,031	163,093	100.00	18,676	5.16	5.33	4.61	18.10	14.55	19.62	43.08	38.41	39.01	33.47	41.32	36.67	0.19	0.39	0.09

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Evansville MMSA	1,031	163,093	100.00	18,676	21.25	13.00	11.74	17.70	19.98	21.73	21.02	16.88	20.56	40.03	38.22	25.10	--	11.93	20.87
Total	1,031	163,093	100.00	18,676	21.25	13.00	11.74	17.70	19.98	21.73	21.02	16.88	20.56	40.03	38.22	25.10	--	11.93	20.87

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Evansville MMSA	791	182,434	100.00	9,551	8.01	26.93	8.25	22.17	15.04	20.49	32.07	21.74	32.46	31.62	31.35	34.45	6.12	4.93	4.36		
Total	791	182,434	100.00	9,551	8.01	26.93	8.25	22.17	15.04	20.49	32.07	21.74	32.46	31.62	31.35	34.45	6.12	4.93	4.36		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues													2022 - 2023	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans			
Evansville MMSA	791	182,434	100.00	9,551	77.71	31.10	51.91	10.30	57.40	11.98	11.50			
Total	791	182,434	100.00	9,551	77.71	31.10	51.91	10.30	57.40	11.98	11.50			

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Louisville MMSA

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Louisville-Jefferson County KY-IN MMSA 2024	342	213,032	100.00	75,340	3.87	4.09	4.30	20.09	15.50	20.02	42.22	25.73	40.96	33.27	54.39	34.21	0.56	0.29	0.49
Total	342	213,032	100.00	75,340	3.87	4.09	4.30	20.09	15.50	20.02	42.22	25.73	40.96	33.27	54.39	34.21	0.56	0.29	0.49

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Louisville-Jefferson County KY-IN MMSA 2024	342	213,032	100.00	75,340	21.83	8.19	11.75	18.72	14.91	22.83	19.77	13.45	20.25	39.68	47.95	29.77	--	15.50	15.40
Total	342	213,032	100.00	75,340	21.83	8.19	11.75	18.72	14.91	22.83	19.77	13.45	20.25	39.68	47.95	29.77	--	15.50	15.40

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Louisville-Jefferson County KY-IN MMSA 2024	103	27,875	100.00	37,555	6.62	6.80	5.38	18.68	11.65	17.06	37.83	36.89	37.55	35.07	41.75	38.41	1.80	2.91	1.59
Total	103	27,875	100.00	37,555	6.62	6.80	5.38	18.68	11.65	17.06	37.83	36.89	37.55	35.07	41.75	38.41	1.80	2.91	1.59

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Louisville-Jefferson County KY-IN MMSA 2024	103	27,875	100.00	37,555	86.47	30.10	50.41	4.00	32.04	9.53	37.86
Total	103	27,875	100.00	37,555	86.47	30.10	50.41	4.00	32.04	9.53	37.86

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

South Bend MMSA

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
South Bend-Elkhart-Mishawaka IN-MI MMSA 2024	488	115,489	100.00	52,368	3.94	2.05	3.02	16.70	17.42	17.66	44.74	35.04	43.85	34.29	45.49	35.16	0.32	--	0.31
Total	488	115,489	100.00	52,368	3.94	2.05	3.02	16.70	17.42	17.66	44.74	35.04	43.85	34.29	45.49	35.16	0.32	--	0.31

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
South Bend-Elkhart-Mishawaka IN-MI MMSA 2024	488	115,489	100.00	52,368	20.64	6.35	12.25	17.72	12.70	22.94	21.12	18.44	22.76	40.52	44.06	30.49	--	18.44	11.56
Total	488	115,489	100.00	52,368	20.64	6.35	12.25	17.72	12.70	22.94	21.12	18.44	22.76	40.52	44.06	30.49	--	18.44	11.56

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
South Bend-Elkhart-Mishawaka IN-MI MMSA 2024	245	75,936	100.00	19,598	6.33	4.90	4.28	20.43	18.78	17.89	43.20	42.86	41.75	29.64	33.47	35.85	0.40	--	0.23		
Total	245	75,936	100.00	19,598	6.33	4.90	4.28	20.43	18.78	17.89	43.20	42.86	41.75	29.64	33.47	35.85	0.40	--	0.23		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022 - 2024	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
South Bend-Elkhart-Mishawaka IN-MI MMSA 2024	245	75,936	100.00	19,598	82.46	33.88	51.03	5.20	55.10	12.34	11.02		
Total	245	75,936	100.00	19,598	82.46	33.88	51.03	5.20	55.10	12.34	11.02		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Illinois

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Champaign MSA 2024	26	63,709	100.00	10,842	3.51	3.85	5.17	21.01	15.38	22.77	30.14	42.31	27.23	44.68	38.46	43.61	0.66	--	1.20		
Total	26	63,709	100.00	10,842	3.51	3.85	5.17	21.01	15.38	22.77	30.14	42.31	27.23	44.68	38.46	43.61	0.66	--	1.20		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Danville MSA 2023	80	5,907	46.24	2,278	5.63	5.00	2.99	6.20	6.25	3.34	54.41	43.75	54.83	32.06	43.75	38.41	1.70	1.25	0.44		
Illinois Non-MSA 2023	93	8,513	53.76	5,926	--	--	--	5.12	5.38	5.16	76.41	69.89	76.73	18.31	23.66	17.89	0.16	1.08	0.22		
Total	173	14,419	100.00	8,204	1.82	2.31	0.83	5.47	5.78	4.66	69.32	57.80	70.65	22.74	32.95	23.59	0.65	1.16	0.28		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Illinois Non-MSA 2024	69	6,638	100.00	3,933	2.52	5.80	1.20	6.99	7.25	7.35	73.05	71.01	73.74	16.78	15.94	17.47	0.65	--	0.25
Total	69	6,638	100.00	3,933	2.52	5.80	1.20	6.99	7.25	7.35	73.05	71.01	73.74	16.78	15.94	17.47	0.65	--	0.25

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Champaign MSA 2024	26	63,709	100.00	10,842	22.83	3.85	11.24	15.98	23.08	20.59	19.29	30.77	19.44	41.89	26.92	29.28	--	15.38	19.45		
Total	26	63,709	100.00	10,842	22.83	3.85	11.24	15.98	23.08	20.59	19.29	30.77	19.44	41.89	26.92	29.28	--	15.38	19.45		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Danville MSA 2023	80	5,907	46.24	2,278	22.71	7.50	8.08	18.41	22.50	21.16	18.48	30.00	23.97	40.40	35.00	28.58	--	5.00	18.22		
Illinois Non-MSA 2023	93	8,513	53.76	5,926	19.54	10.75	12.77	16.25	13.98	22.17	22.51	32.26	22.56	41.71	38.71	29.97	--	4.30	12.52		
Total	173	14,419	100.00	8,204	20.55	9.25	11.47	16.94	17.92	21.89	21.22	31.21	22.95	41.29	36.99	29.58	--	4.62	14.10		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Illinois Non-MSA 2024	69	6,638	100.00	3,933	21.47	18.84	11.37	16.79	15.94	23.57	21.49	27.54	21.64	40.25	30.43	27.33	--	7.25	16.09		
Total	69	6,638	100.00	3,933	21.47	18.84	11.37	16.79	15.94	23.57	21.49	27.54	21.64	40.25	30.43	27.33	--	7.25	16.09		

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Champaign MSA 2024	6,798	100.00	5,659	9.90	--	10.18	15.39	16.67	16.70	31.76	50.00	25.13	38.07	33.33	44.41	4.88	--	3.59			
Total	6,798	100.00	5,659	9.90	--	10.18	15.39	16.67	16.70	31.76	50.00	25.13	38.07	33.33	44.41	4.88	--	3.59			

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Danville MSA 2023	25	5,475	60.98	1,358	14.48	40.00	9.57	10.01	16.00	8.10	48.00	36.00	49.71	25.17	8.00	31.15	2.34	--	1.47		
Illinois Non-MSA 2023	16	2,280	39.02	3,242	--	--	--	11.71	25.00	11.66	68.28	43.75	63.91	16.37	25.00	20.48	3.64	6.25	3.95		
Total	41	7,755	100.00	4,600	4.19	24.39	2.83	11.22	19.51	10.61	62.41	39.02	59.72	18.92	14.63	23.63	3.27	2.44	3.22		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Illinois Non-MSA 2024	16	4,119	100.00	--	5.45	37.50	--	11.37	6.25	--	64.45	43.75	--	15.59	12.50	--	3.14	--	--
Total	16	4,119	100.00	--	5.45	37.50	--	11.37	6.25	--	64.45	43.75	--	15.59	12.50	--	3.14	--	--

*Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Champaign MSA 2024	6	798	100.00	5,659	80.67	50.00	53.42	4.52	16.67	14.81	33.33
Total	6	798	100.00	5,659	80.67	50.00	53.42	4.52	16.67	14.81	33.33

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Danville MSA 2023	25	5,475	60.98	1,358	75.84	24.00	54.27	5.96	52.00	18.20	24.00
Illinois Non-MSA 2023	16	2,280	39.02	3,242	77.32	43.75	54.07	5.79	50.00	16.89	6.25
Total	41	7,755	100.00	4,600	76.89	31.71	54.13	5.84	51.22	17.27	17.07

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2024**

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Illinois Non-MSA 2024	16	4,119	100.00	--	76.77	37.50	--	5.74	56.25	17.49	6.25
Total	16	4,119	100.00	--	76.77	37.50	--	5.74	56.25	17.49	6.25

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022 - 2024**

Assessment Area:	Total Loans to Farm			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Champaign MSA 2024	12	2,269	100.00	305	4.74	--	0.33	9.23	--	0.66	46.63	75.00	53.44	39.40	25.00	45.57	--	--	--
Total	12	2,269	100.00	305	4.74	--	0.33	9.23	--	0.66	46.63	75.00	53.44	39.40	25.00	45.57	--	--	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022 - 2023**

Assessment Area:	Total Loans to Farm			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Danville MSA 2023	16	2,568	14.04	216	0.52	--	0.46	3.63	--	--	48.70	31.25	47.22	47.15	68.75	52.31	--	--	--
Illinois Non-MSA 2023	98	16,523	85.96	611	--	--	--	3.15	--	0.16	70.95	71.43	61.54	25.90	28.57	37.97	--	--	0.33
Total	114	19,091	100.00	827	0.16	--	0.12	3.30	--	0.12	64.21	65.79	57.80	32.34	34.21	41.72	--	--	0.24

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farm			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Illinois Non-MSA 2024	43	8,323	100.00	--	0.63	--	--	3.79	--	--	73.82	58.14	--	21.77	41.86	--	--	--	--
Total	43	8,323	100.00	--	0.63	--	--	3.79	--	--	73.82	58.14	--	21.77	41.86	--	--	--	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Champaign MSA 2024	12	2,269	100.00	305	96.51	100.00	45.90	1.00	--	2.49	--
Total	12	2,269	100.00	305	96.51	100.00	45.90	1.00	--	2.49	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Danville MSA 2023	16	2,568	14.04	216	99.48	81.25	38.43	--	18.75	0.52	--
Illinois Non-MSA 2023	98	16,523	85.96	611	97.07	81.63	59.74	1.35	16.33	1.58	2.04
Total	114	19,091	100.00	827	97.80	81.58	54.17	0.94	16.67	1.26	1.75

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Illinois Non-MSA 2024	43	8,323	100.00	--	97.79	88.37	--	0.95	11.63	1.26	--
Total	43	8,323	100.00	--	97.79	88.37	--	0.95	11.63	1.26	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Indiana

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Bloomington MSA 2024	490	99,273	28.49	9,344	2.23	5.92	3.14	14.10	14.29	12.02	38.66	31.43	39.05	43.08	46.53	43.90	1.92	1.84	1.88		
Fort Wayne MSA 2024	370	83,580	21.51	35,313	3.53	3.78	2.60	17.88	10.27	16.57	41.79	23.24	37.69	36.64	62.43	42.97	0.16	0.27	0.16		
Lafayette-West Lafayette MSA 2024	438	86,200	25.47	13,511	2.81	2.51	3.54	12.40	10.73	14.03	45.40	47.95	42.60	39.39	38.81	39.66	--	--	0.16		
Terre Haute MSA 2024	422	56,253	24.53	8,174	4.31	2.84	4.23	16.99	16.59	22.96	45.47	42.18	39.91	33.19	38.39	32.86	0.04	--	0.01		
Total	1,720	325,307	100.00	66,342	3.31	3.84	3.07	16.10	13.08	16.20	42.59	36.51	39.16	37.62	45.99	41.18	0.38	0.58	0.38		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Indiana Non-MSA 2023	778	94,290	27.74	23,285	0.32	0.26	0.12	9.63	8.10	10.18	66.57	65.17	65.51	23.48	26.48	24.17	--	--	--		
Indianapolis CSA 2023	2,027	578,427	72.26	139,936	4.97	5.08	5.12	16.78	14.90	15.97	41.74	32.17	42.70	35.55	47.21	35.32	0.96	0.64	0.87		
Total	2,805	672,716	100.00	163,221	4.00	3.74	4.40	15.28	13.01	15.14	46.94	41.32	45.96	33.02	41.46	33.73	0.76	0.46	0.74		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Evansville MSA 2024	393	83,527	24.14	7,615	6.35	5.09	5.71	17.20	11.96	18.29	43.64	38.42	41.58	32.59	44.27	34.26	0.22	0.25	0.14		
Indiana Non-MSA 2024	354	48,030	21.74	12,289	0.30	0.28	0.15	8.90	9.04	10.16	67.18	67.23	64.93	23.61	23.45	24.75	--	--	--		
Indianapolis CSA 2024	881	184,732	54.12	65,961	4.86	8.63	5.39	15.90	18.84	15.92	40.88	29.63	42.07	37.38	41.88	35.82	0.98	1.02	0.79		
Total	1,628	316,288	100.00	85,865	4.10	5.96	4.67	14.63	15.05	15.31	46.47	39.93	45.30	34.09	38.45	34.10	0.70	0.61	0.62		

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Bloomington MSA 2024	490	99,273	28.49	9,344	19.11	8.98	9.58	16.98	18.16	18.54	20.09	17.55	21.45	43.82	44.29	34.87	--	11.02	15.57		
Fort Wayne MSA 2024	370	83,580	21.51	35,313	19.45	5.41	11.32	18.62	16.76	23.33	21.90	16.22	22.71	40.03	48.92	29.01	--	12.70	13.63		
Lafayette-West Lafayette MSA 2024	438	86,200	25.47	13,511	20.94	8.45	7.60	16.75	18.72	19.67	20.60	23.97	22.81	41.71	43.84	36.62	--	5.02	13.29		
Terre Haute MSA 2024	422	56,253	24.53	8,174	22.51	13.51	10.12	16.91	21.56	22.42	21.02	21.56	21.47	39.56	38.39	29.95	--	4.98	16.04		
Total	1,720	325,307	100.00	66,342	20.18	9.19	10.17	17.71	18.84	21.80	21.21	19.88	22.40	40.89	43.72	31.50	--	8.37	14.13		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Indiana Non-MSA 2023	778	94,290	27.74	23,285	17.39	12.72	10.80	18.29	21.34	23.84	22.72	25.96	23.63	41.59	34.96	26.60	--	5.01	15.13		
Indianapolis CSA 2023	2,027	578,427	72.26	139,936	21.07	9.08	10.69	17.73	17.32	21.55	20.59	17.22	21.18	40.60	48.59	31.25	--	7.79	15.33		
Total	2,805	672,716	100.00	163,221	20.35	10.09	10.71	17.84	18.43	21.88	21.01	19.64	21.53	40.80	44.81	30.58	--	7.02	15.30		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2024**

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Evansville MSA 2024	393	83,527	24.14	7,615	21.35	9.92	10.01	18.06	16.54	19.91	21.23	20.36	20.13	39.35	40.46	25.91	--	12.72	24.04
Indiana Non-MSA 2024	354	48,030	21.74	12,289	16.91	11.58	8.88	18.00	19.77	23.23	22.60	25.71	22.98	42.48	35.03	27.00	--	7.91	17.91
Indianapolis CSA 2024	881	184,732	54.12	65,961	20.86	12.15	9.34	17.49	24.40	20.40	20.41	13.51	20.46	41.23	42.34	30.36	--	7.60	19.44
Total	1,628	316,288	100.00	85,865	20.16	11.49	9.34	17.65	21.50	20.76	20.91	17.81	20.79	41.27	40.29	29.48	--	8.91	19.63

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Bloomington MSA 2024	211	46,151	27.65	4,015	12.81	13.74	13.10	14.67	17.54	14.20	31.69	34.12	32.88	35.42	33.18	36.71
Fort Wayne MSA 2024	234	54,878	30.67	13,084	4.76	2.99	3.45	18.46	14.10	19.31	40.13	55.13	36.65	32.03	23.08	36.27
Lafayette-West Lafayette MSA 2024	122	25,677	15.99	4,758	8.59	13.93	7.71	25.95	29.51	21.19	34.04	34.43	37.60	27.61	19.67	31.15
Terre Haute MSA 2024	196	32,487	25.69	2,673	8.39	9.69	8.53	18.91	22.96	18.93	41.70	40.31	40.14	25.37	20.92	27.35
Total	763	159,193	100.00	24,530	7.24	9.44	6.41	19.27	19.79	18.80	37.73	42.20	36.60	31.05	24.77	34.37

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Indiana Non-MSA 2023	453	69,456	32.97	12,098	0.39	--	0.12	15.22	9.93	12.23	62.09	66.67	62.57	22.30	23.40	25.08	--	--	--
Indianapolis CSA 2023	921	193,155	67.03	87,315	7.16	6.41	5.57	19.13	14.77	16.08	36.63	42.56	38.41	33.81	33.66	37.91	3.27	2.61	2.04
Total	1,374	262,611	100.00	99,413	6.26	4.29	4.90	18.61	13.17	15.61	40.02	50.51	41.35	32.27	30.28	36.35	2.84	1.75	1.79

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-In come Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Evansville MSA 2024	440	94,953	43.22	--	9.37	41.36	--	19.87	12.95	--	33.89	22.73	--	29.47	18.86	--	7.39	4.09	--
Indiana Non-MSA 2024	185	27,645	18.17	--	0.36	--	--	14.22	10.81	--	64.17	61.62	--	21.25	27.57	--	--	--	--
Indianapolis CSA 2024	393	96,140	38.61	--	7.38	12.21	--	18.93	17.05	--	35.94	36.39	--	34.63	32.82	--	3.12	1.53	--
Total	1,018	218,738	100.00	--	6.61	22.59	--	18.37	14.15	--	39.55	35.07	--	32.42	25.83	--	3.05	2.36	--

*Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bloomington MSA 2024	211	46,151	27.65	4,015	86.57	32.23	51.86	3.81	58.29	9.62	9.48
Fort Wayne MSA 2024	234	54,878	30.67	13,084	85.05	44.44	53.16	4.29	50.43	10.66	5.13
Lafayette-West Lafayette MSA 2024	122	25,677	15.99	4,758	83.91	38.52	53.91	3.30	54.92	12.79	6.56
Terre Haute MSA 2024	196	32,487	25.69	2,673	80.00	40.82	47.62	4.93	48.47	15.07	10.71
Total	763	159,193	100.00	24,530	84.54	39.19	52.49	4.09	52.82	11.36	7.99

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Indiana Non-MSA 2023	453	69,456	32.97	12,098	82.80	50.33	53.04	4.47	39.51	12.73	10.15
Indianapolis CSA 2023	921	193,155	67.03	87,315	87.65	33.98	52.25	3.96	55.70	8.39	10.31
Total	1,374	262,611	100.00	99,413	87.00	39.37	52.35	4.03	50.36	8.96	10.26

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Evansville MSA 2024	440	94,953	43.22	--	82.93	18.64	--	4.60	74.32	12.47	7.05
Indiana Non-MSA 2024	185	27,645	18.17	--	82.59	40.00	--	4.23	40.00	13.18	20.00
Indianapolis CSA 2024	393	96,140	38.61	--	87.10	26.72	--	3.85	59.54	9.05	13.74
Total	1,018	218,738	100.00	--	86.15	25.64	--	3.96	62.38	9.89	11.98

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2024	
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	
Bloomington MSA 2024	2	569	11.76	58	2.28	--	--	15.53	--	8.62	45.66	100.00	29.31	36.07	--	60.34	0.46	--	1.72	
Fort Wayne MSA 2024	0	0	0.00	309	2.65	--	0.65	10.88	--	1.62	46.18	--	61.17	38.68	--	34.95	1.62	--	1.62	
Lafayette-West Lafayette MSA 2024	4	354	23.53	177	3.77	--	1.13	10.78	25.00	1.13	40.97	75.00	41.81	43.40	--	55.93	1.08	--	--	
Terre Haute MSA 2024	11	975	64.71	280	3.69	--	--	11.98	--	1.79	53.46	54.55	75.36	30.88	45.45	22.86	--	--	--	
Total	17	1,898	100.00	824	3.03	--	0.49	11.70	5.88	2.06	45.86	64.71	59.59	38.33	29.41	37.14	1.08	--	0.73	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2023	
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	
Indiana Non-MSA 2023	377	56,996	94.01	2,353	--	--	0.04	4.29	7.43	2.55	66.83	70.82	72.46	28.88	21.75	24.95	--	--	--	
Indianapolis CSA 2023	24	3,453	5.99	1,120	5.72	--	1.16	15.24	12.50	6.79	48.49	70.83	70.09	29.59	16.67	21.79	0.96	--	0.18	
Total	401	60,449	100.00	3,473	3.78	--	0.40	11.53	7.73	3.92	54.70	70.82	71.70	29.35	21.45	23.93	0.64	--	0.06	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2024
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	
Evansville MSA 2024	7	1,562	4.07	--	3.49	--	--	9.17	--	--	52.48	28.57	--	34.13	71.43	--	0.73	--	--	
Indiana Non-MSA 2024	154	24,202	89.53	--	--	--	--	3.88	5.84	--	67.62	78.57	--	28.50	15.58	--	--	--	--	
Indianapolis CSA 2024	11	1,889	6.40	--	6.04	--	--	15.69	27.27	--	46.12	36.36	--	30.97	36.36	--	1.18	--	--	
Total	172	27,653	100.00	--	3.77	--	--	11.12	6.98	--	53.93	73.84	--	30.43	19.19	--	0.74	--	--	

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue												2022 - 2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Bloomington MSA 2024	2	569	11.76	58	97.26	100.00	60.34	1.83	--	0.91	--	
Fort Wayne MSA 2024	0	0	0.00	309	97.35	--	60.19	1.47	--	1.18	--	
Lafayette-West Lafayette MSA 2024	4	354	23.53	177	96.77	100.00	41.24	1.35	--	1.89	--	
Terre Haute MSA 2024	11	975	64.71	280	99.08	100.00	63.57	0.92	--	--	--	
Total	17	1,898	100.00	824	97.44	100.00	57.28	1.41	--	1.14	--	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2023	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Indiana Non-MSA 2023	377	56,996	94.01	2,353	98.23	75.86	58.52	0.97	22.28	0.81	1.86	
Indianapolis CSA 2023	24	3,453	5.99	1,120	97.47	79.17	55.54	1.27	12.50	1.27	8.33	
Total	401	60,449	100.00	3,473	97.73	76.06	57.56	1.16	21.70	1.11	2.24	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2024	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Evansville MSA 2024	7	1,562	4.07	--	98.35	71.43	--	0.73	28.57	0.92	--	
Indiana Non-MSA 2024	154	24,202	89.53	--	98.49	77.27	--	0.86	22.08	0.65	0.65	
Indianapolis CSA 2024	11	1,889	6.40	--	97.54	72.73	--	1.18	9.09	1.27	18.18	
Total	172	27,653	100.00	--	97.94	76.74	--	1.03	21.51	1.03	1.74	

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Kentucky

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Lexington MSA 2024	103	35,736	22.25	23,920	3.48	1.94	4.22	17.61	8.74	16.48	35.74	33.01	38.62	42.61	55.34	39.87	0.57	0.97	0.78		
Owensboro MSA 2024	360	65,711	77.75	8,249	--	--	--	16.63	12.22	16.14	57.94	55.28	59.34	24.65	31.94	23.35	0.78	0.56	1.18		
Total	463	101,448	100.00	32,169	2.53	0.43	3.14	17.34	11.45	16.39	41.79	50.32	43.93	37.72	37.15	35.63	0.63	0.65	0.88		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
KY Non-MSA 2023	224	21,432	100.00	3,873	--	--	--	5.13	2.23	6.38	64.10	64.29	65.43	30.77	33.48	28.20	--	--	--		
Total	224	21,432	100.00	3,873	--	--	--	5.13	2.23	6.38	64.10	64.29	65.43	30.77	33.48	28.20	--	--	--		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
KY Non-MSA 2024	110	11,058	100.00	2,601	--	--	--	4.20	4.55	4.84	65.90	57.27	66.82	29.90	38.18	28.30	--	--	--	
Total	110	11,058	100.00	2,601	--	--	--	4.20	4.55	4.84	65.90	57.27	66.82	29.90	38.18	28.30	--	--	--	

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Lexington MSA 2024	103	35,736	22.25	23,920	22.45	4.85	7.90	16.17	11.65	17.98	19.17	10.68	19.80	42.21	68.93	38.57	--	3.88	15.76	
Owensboro MSA 2024	360	65,711	77.75	8,249	21.62	4.72	10.12	17.52	21.11	22.26	19.69	25.28	21.75	41.17	40.56	28.88	--	8.33	17.00	
Total	463	101,448	100.00	32,169	22.23	4.75	8.47	16.52	19.01	19.07	19.31	22.03	20.30	41.93	46.87	36.08	--	7.34	16.08	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022 - 2023

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
KY Non-MSA 2023	224	21,432	100.00	3,873	18.07	8.04	5.55	16.65	19.20	17.82	21.36	20.09	22.57	43.91	46.43	34.99	--	6.25	19.08
Total	224	21,432	100.00	3,873	18.07	8.04	5.55	16.65	19.20	17.82	21.36	20.09	22.57	43.91	46.43	34.99	--	6.25	19.08

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2024

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
KY Non-MSA 2024	110	11,058	100.00	2,601	17.85	10.00	5.19	15.02	18.18	14.73	20.66	20.00	21.38	46.47	45.45	38.52	--	6.36	20.18
Total	110	11,058	100.00	2,601	17.85	10.00	5.19	15.02	18.18	14.73	20.66	20.00	21.38	46.47	45.45	38.52	--	6.36	20.18

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022 - 2024

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Lexington MSA 2024	32	12,423	14.68	15,609	4.79	--	4.66	18.26	18.75	17.39	32.88	53.13	33.54	36.68	12.50	38.54	7.38	15.63	5.86
Owensboro MSA 2024	186	42,257	85.32	3,494	--	--	--	21.23	33.33	22.04	47.55	31.72	47.17	23.13	30.11	26.47	8.08	4.84	4.32
Total	218	54,680	100.00	19,103	4.01	--	3.81	18.75	31.19	18.24	35.29	34.86	36.03	34.46	27.52	36.33	7.49	6.42	5.58

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
KY Non-MSA 2023	77	15,809	100.00	2,116	--	--	--	14.48	10.39	9.31	60.38	50.65	61.34	25.14	38.96	29.35	--	--	--
Total	77	15,809	100.00	2,116	--	--	--	14.48	10.39	9.31	60.38	50.65	61.34	25.14	38.96	29.35	--	--	--

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
KY Non-MSA 2024	33	7,683	100.00	--	--	--	--	8.03	9.09	--	67.29	51.52	--	24.67	39.39	--	--	--	--
Total	33	7,683	100.00	--	--	--	--	8.03	9.09	--	67.29	51.52	--	24.67	39.39	--	--	--	--

*Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM			Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Lexington MSA 2024	32	12,423	14.68	15,609	86.31	28.13	51.73	3.57	43.75	10.12	28.13	
Owensboro MSA 2024	186	42,257	85.32	3,494	82.57	41.40	56.47	4.49	46.24	12.95	12.37	
Total	218	54,680	100.00	19,103	85.69	39.45	52.60	3.72	45.87	10.59	14.68	

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KY Non-MSA 2023	77	15,809	100.00	2,116	80.57	46.75	49.01	4.06	32.47	15.37	20.78
Total	77	15,809	100.00	2,116	80.57	46.75	49.01	4.06	32.47	15.37	20.78

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KY Non-MSA 2024	33	7,683	100.00	--	80.64	39.39	--	3.92	33.33	15.44	27.27
Total	33	7,683	100.00	--	80.64	39.39	--	3.92	33.33	15.44	27.27

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2024		
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate		
Lexington MSA 2024	0	0	0.00	253	3.35	--	3.56	13.17	--	6.32	39.52	--	41.90	38.56	--	42.29	5.39	--	5.93		
Owensboro MSA 2024	7	445	100.00	500	--	--	--	8.66	--	0.40	56.30	--	51.40	33.46	100.00	48.00	1.57	--	0.20		
Total	7	445	100.00	753	2.57	--	1.20	12.12	--	2.39	43.43	--	48.21	37.37	100.00	46.08	4.50	--	2.12		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022 - 2023		
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate		
KY Non-MSA 2023	30	4,665	100.00	275	--	--	--	6.75	10.00	1.45	67.93	80.00	60.73	25.32	10.00	37.82	--	--	--		
Total	30	4,665	100.00	275	--	--	--	6.75	10.00	1.45	67.93	80.00	60.73	25.32	10.00	37.82	--	--	--		

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 11: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2024		
Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate		
KY Non-MSA 2024	11	1,599	100.00	--	--	--	--	3.03	9.09	--	72.45	90.91	--	24.52	--	--	--	--	--		
Total	11	1,599	100.00	--	--	--	--	3.03	9.09	--	72.45	90.91	--	24.52	--	--	--	--	--		

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Lexington MSA 2024	0	0	0.00	253	97.25	--	66.01	1.32	--	1.44	--
Owensboro MSA 2024	7	445	100.00	500	98.03	100.00	57.80	1.57	--	0.39	--
Total	7	445	100.00	753	97.43	100.00	60.56	1.38	--	1.19	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2022 - 2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KY Non-MSA 2023	30	4,665	100.00	275	97.89	73.33	52.36	0.42	26.67	1.69	--
Total	30	4,665	100.00	275	97.89	73.33	52.36	0.42	26.67	1.69	--

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 12: Assessment Area Distribution of Loans to Farms by Gross Annual Revenue											2024
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KY Non-MSA 2024	11	1,599	100.00	--	98.62	81.82	--	0.28	18.18	1.10	--
Total	11	1,599	100.00	--	98.62	81.82	--	0.28	18.18	1.10	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Michigan

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Detroit CSA 2024	1,272	332,670	41.97	61,079	2.40	1.65	2.69	11.25	9.20	11.50	49.53	46.15	51.66	36.67	41.82	33.74	0.14	1.18	0.34
Grand Rapids MSA 2024	1,421	475,207	46.88	80,431	1.50	3.17	2.42	12.11	11.82	14.14	49.98	40.46	48.95	35.27	44.12	33.60	1.15	0.42	0.87
Jackson MSA 2024	98	25,649	3.23	11,836	1.76	1.02	1.96	23.51	19.39	24.75	42.98	40.82	42.31	31.66	38.78	29.49	0.09	--	0.36
Kalamazoo-Battle Creek-Portage CSA 2024	240	126,488	7.92	30,996	3.19	1.67	3.92	19.54	19.17	21.37	42.29	36.67	39.95	34.91	42.08	34.52	0.08	0.42	0.20
Total	3,031	960,014	100.00	184,342	2.12	2.34	2.73	13.86	11.55	15.16	48.04	42.56	47.91	35.45	42.82	33.54	0.53	0.73	0.55

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Detroit CSA 2024	1,272	332,670	41.97	61,079	18.11	7.23	9.62	17.98	16.90	21.24	22.04	20.99	23.58	41.87	48.35	33.76	--	6.53	11.80		
Grand Rapids MSA 2024	1,421	475,207	46.88	80,431	17.58	4.64	9.33	17.61	18.44	22.79	23.03	17.10	23.46	41.79	51.86	33.67	--	7.95	10.74		
Jackson MSA 2024	98	25,649	3.23	11,836	18.75	13.27	13.48	19.04	23.47	24.67	20.95	21.43	22.14	41.27	38.78	26.86	--	3.06	12.85		
Kalamazoo-Battle Creek-Portage CSA 2024	240	126,488	7.92	30,996	21.60	9.17	12.28	17.93	19.58	23.74	19.71	17.92	23.19	40.76	42.50	29.51	--	10.83	11.29		
Total	3,031	960,014	100.00	184,342	18.52	6.37	10.19	17.89	18.05	22.56	21.99	18.94	23.37	41.61	49.22	32.57	--	7.42	11.32		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Detroit CSA 2024	361	91,974	37.45	31,826	4.53	2.22	3.57	13.30	9.97	11.74	43.73	49.03	46.86	36.43	37.40	36.94	2.01	1.39	0.89
Grand Rapids MSA 2024	430	120,313	44.61	35,722	2.24	1.40	2.07	16.69	20.70	16.35	43.83	42.09	44.09	36.43	35.81	36.81	0.81	--	0.68
Jackson MSA 2024	14	2,310	1.45	3,682	3.32	--	2.58	29.07	35.71	29.36	37.69	14.29	38.54	23.98	50.00	25.69	5.94	--	3.83
Kalamazoo-Battle Creek-Portage CSA 2024	159	40,040	16.49	10,108	6.68	10.06	6.28	22.36	23.27	19.06	39.70	36.48	38.65	30.97	29.56	35.84	0.29	0.63	0.16
Total	964	254,637	100.00	81,338	3.82	3.11	3.21	16.97	17.32	15.47	42.83	43.36	44.25	34.92	35.58	36.24	1.46	0.62	0.84

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Detroit CSA 2024	361	91,974	37.45	31,826	86.38	37.95	53.58	4.10	57.34	9.52	4.71
Grand Rapids MSA 2024	430	120,313	44.61	35,722	85.13	32.56	49.60	5.08	62.09	9.79	5.35
Jackson MSA 2024	14	2,310	1.45	3,682	83.09	64.29	50.46	5.28	28.57	11.63	7.14
Kalamazoo-Battle Creek-Portage CSA 2024	159	40,040	16.49	10,108	82.98	30.82	50.53	5.28	64.15	11.74	5.03
Total	964	254,637	100.00	81,338	85.16	34.75	51.31	4.76	60.17	10.09	5.08

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Minnesota

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Mankato MSA 2024	42	9,213	1.74	3,669	--	--	--	16.98	33.33	20.52	77.48	64.29	74.57	5.55	2.38	4.88	--	--	--
Minneapolis MSA 2024	2,313	913,273	95.70	272,482	2.38	1.12	3.09	16.40	7.65	16.98	48.27	51.75	47.34	32.86	39.47	32.42	0.08	--	0.16
Minnesota Non-MSA 2024	62	5,293	2.57	833	--	--	--	14.29	16.13	19.57	85.71	83.87	80.43	--	--	--	--	--	--
Total	2,417	927,779	100.00	276,984	2.33	1.08	3.04	16.40	8.32	17.04	49.03	52.79	47.80	32.16	37.82	31.96	0.08	--	0.16

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Mankato MSA 2024	42	9,213	1.74	3,669	22.07	7.14	11.39	17.87	11.90	26.71	24.62	9.52	22.02	35.44	23.81	25.81	--	47.62	14.06
Minneapolis MSA 2024	2,313	913,273	95.70	272,482	19.48	9.38	10.66	17.87	18.81	24.85	22.76	21.05	22.39	39.89	44.27	27.93	--	6.49	14.18
Minnesota Non-MSA 2024	62	5,293	2.57	833	20.47	12.90	17.41	19.12	20.97	25.33	23.46	32.26	20.17	36.95	27.42	22.33	--	6.45	14.77
Total	2,417	927,779	100.00	276,984	19.54	9.43	10.69	17.88	18.74	24.87	22.80	21.14	22.38	39.79	43.48	27.88	--	7.20	14.18

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Mankato MSA 2024	19	4,037	1.04	2,207	--	--	--	31.12	26.32	31.17	65.88	73.68	65.61	3.00	--	3.22	--	--	--		
Minneapolis MSA 2024	1,754	455,918	96.43	144,641	4.29	1.03	3.45	18.97	19.95	16.72	42.55	43.16	43.17	33.27	35.18	35.98	0.91	0.68	0.67		
Minnesota Non-MSA 2024	46	4,410	2.53	443	--	--	--	8.33	4.35	16.70	91.67	95.65	83.30	--	--	--	--	--	--		
Total	1,819	464,365	100.00	147,291	4.19	0.99	3.39	19.16	19.63	16.94	43.20	44.80	43.63	32.56	33.92	35.39	0.88	0.66	0.65		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues													2022 - 2024	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans			
Mankato MSA 2024	19	4,037	1.04	2,207	82.24	36.84	45.04	4.67	63.16	13.09	--			
Minneapolis MSA 2024	1,754	455,918	96.43	144,641	87.45	29.59	50.26	4.23	65.68	8.32	4.73			
Minnesota Non-MSA 2024	46	4,410	2.53	443	78.27	73.91	52.14	6.25	17.39	15.48	8.70			
Total	1,819	464,365	100.00	147,291	87.31	30.79	50.18	4.25	64.43	8.44	4.78			

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farm				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Aggregate
Mankato MSA 2024	0	0	0.00	209	--	--	--	6.23	--	1.44	91.58	--	98.56	2.20	--	--	--	--	--
Minneapolis MSA 2024	37	2,868	18.50	1,087	2.07	--	0.64	14.36	8.11	7.27	50.77	86.49	61.45	32.62	5.41	30.63	0.18	--	--
Minnesota Non-MSA 2024	163	33,034	81.50	725	--	--	--	0.45	2.45	1.79	99.55	97.55	98.21	--	--	--	--	--	--
Total	200	35,902	100.00	2,021	1.87	--	0.35	13.29	3.50	4.70	55.20	95.50	78.48	29.48	1.00	16.48	0.16	--	--

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Farms	% Bank Loans	% Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Mankato MSA 2024	0	0	0.00	209	95.60	--	32.06	3.30	--	1.10	--
Minneapolis MSA 2024	37	2,868	18.50	1,087	96.75	91.89	65.50	1.76	8.11	1.49	--
Minnesota Non-MSA 2024	163	33,034	81.50	725	99.09	80.37	55.03	0.45	17.18	0.45	2.45
Total	200	35,902	100.00	2,021	96.79	82.50	58.29	1.79	15.50	1.42	2.00

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Tennessee

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Chattanooga CSA 2024	24	17,383	4.20	13,581	3.45	4.17	3.99	10.40	4.17	13.35	50.76	58.33	46.03	34.56	33.33	35.99	0.82	--	0.64
Knoxville MSA 2024	5	1,788	0.88	14,614	3.70	--	4.97	10.88	--	11.84	40.65	40.00	39.07	44.74	60.00	44.00	0.03	--	0.12
Nashville MSA 2024	412	207,301	72.15	46,638	2.27	1.94	3.49	16.36	9.95	16.72	41.12	28.40	38.85	39.72	59.47	40.27	0.53	0.24	0.68
Tennessee Non-MSA 2024	130	25,869	22.77	5,416	--	--	--	10.66	12.31	10.54	67.59	63.85	66.23	21.74	23.85	23.23	0.01	--	--
Total	571	252,341	100.00	80,249	2.55	1.58	3.61	13.70	10.16	14.84	45.27	37.83	41.95	38.04	50.26	39.08	0.44	0.18	0.52

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Chattanooga CSA 2024	24	17,383	4.20	13,581	19.54	--	6.03	16.77	8.33	15.31	19.44	16.67	21.05	44.25	62.50	37.21	--	12.50	20.40
Knoxville MSA 2024	5	1,788	0.88	14,614	18.76	--	5.39	15.93	20.00	14.39	19.81	20.00	20.11	45.51	60.00	41.08	--	--	19.04
Nashville MSA 2024	412	207,301	72.15	46,638	19.48	3.40	4.79	16.85	14.81	15.11	20.64	15.78	19.15	43.03	61.89	41.02	--	4.13	19.94
Tennessee Non-MSA 2024	130	25,869	22.77	5,416	19.41	9.23	3.69	18.26	13.85	14.55	20.84	18.46	22.06	41.50	52.31	39.59	--	6.15	20.11
Total	571	252,341	100.00	80,249	19.35	4.55	5.03	16.79	14.36	14.97	20.29	16.46	19.84	43.56	59.72	40.29	--	4.90	19.86

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Chattanooga CSA 2024	37	10,761	20.90	--	6.88	21.62	--	18.53	21.62	--	39.43	16.22	--	34.46	40.54	--	0.70	--	--
Knoxville MSA 2024	3	925	1.69	--	5.77	--	--	9.48	--	--	31.08	33.33	--	52.41	66.67	--	1.26	--	--
Nashville MSA 2024	85	23,213	48.02	--	4.02	3.53	--	20.03	15.29	--	30.77	41.18	--	42.18	36.47	--	3.01	3.53	--
Tennessee Non-MSA 2024	52	10,147	29.38	--	--	--	--	17.25	26.92	--	61.16	51.92	--	21.60	21.15	--	--	--	--
Total	177	45,046	100.00	--	4.66	6.21	--	17.83	19.77	--	33.82	38.98	--	41.55	33.33	--	2.15	1.69	--

*Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chattanooga CSA 2024	37	10,761	20.90	--	78.21	37.84	--	10.80	37.84	10.99	24.32
Knoxville MSA 2024	3	925	1.69	--	78.06	66.67	--	10.20	33.33	11.74	--
Nashville MSA 2024	85	23,213	48.02	--	81.38	30.59	--	8.76	62.35	9.86	7.06
Tennessee Non-MSA 2024	52	10,147	29.38	--	74.00	50.00	--	10.70	40.38	15.30	9.62
Total	177	45,046	100.00	--	79.89	38.42	--	9.47	50.28	10.64	11.30

*Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of Wisconsin

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Appleton CSA 2024	297	52,133	15.17	30,509	0.62	0.34	1.20	15.30	11.45	16.85	63.80	63.64	61.61	20.12	24.24	19.82	0.16	0.34	0.51
Madison CSA 2024	848	288,461	43.31	66,554	0.73	0.47	0.59	12.54	11.67	12.28	56.81	54.72	56.77	29.78	33.02	30.12	0.15	0.12	0.21
Milwaukee-Racine-Waukesha CSA 2024	623	609,094	31.82	103,039	6.65	6.26	7.48	14.68	13.80	15.45	35.84	26.48	34.97	42.60	52.97	41.83	0.22	0.48	0.26
Wisconsin Non-MSA 2024	190	34,939	9.70	13,352	--	--	--	2.07	3.68	2.67	49.78	50.53	49.12	48.16	45.79	48.19	--	--	--
Total	1,958	984,628	100.00	213,454	3.54	2.25	3.97	13.22	11.54	13.86	47.16	46.68	46.46	35.90	39.27	35.43	0.17	0.26	0.27

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Appleton CSA 2024	297	52,133	15.17	30,509	18.33	11.45	10.96	19.56	21.89	24.90	24.09	25.25	24.03	38.02	39.06	28.67	--	2.36	11.44
Madison CSA 2024	848	288,461	43.31	66,554	17.74	10.85	7.58	18.09	20.87	19.74	23.10	23.11	25.70	41.07	40.33	38.24	--	4.83	8.74
Milwaukee-Racine-Waukesha CSA 2024	623	609,094	31.82	103,039	24.34	6.10	9.05	17.00	14.61	20.19	19.94	15.89	21.65	38.72	47.51	36.15	--	15.89	12.96
Wisconsin Non-MSA 2024	190	34,939	9.70	13,352	13.25	3.68	5.40	16.51	20.00	16.77	22.34	23.68	22.21	47.91	50.53	44.74	--	2.11	10.87
Total	1,958	984,628	100.00	213,454	20.91	8.73	8.64	17.63	18.95	20.51	21.56	21.20	23.29	39.90	43.41	36.27	--	7.71	11.30

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Appleton CSA 2024	16	3,287	2.40	11,640	3.40	--	2.78	15.04	6.25	12.80	61.97	75.00	63.38	17.69	18.75	19.42	1.91	--	1.62
Madison CSA 2024	115	34,808	17.27	23,055	5.37	7.83	4.26	13.54	6.96	12.54	50.71	48.70	49.93	27.89	34.78	31.52	2.49	1.74	1.76
Milwaukee-Racine-Waukesha CSA 2024	516	183,273	77.48	55,101	12.87	7.56	8.62	18.51	20.54	16.45	31.28	29.26	30.88	36.45	42.25	43.47	0.88	0.39	0.58
Wisconsin Non-MSA 2024	19	6,555	2.85	6,604	--	--	--	3.98	5.26	2.82	53.51	57.89	51.08	42.52	36.84	46.11	--	--	--
Total	666	227,923	100.00	96,400	8.80	7.21	6.28	15.77	17.42	14.14	41.87	34.53	40.74	32.16	40.24	37.89	1.41	0.60	0.95

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Appleton CSA 2024	16	3,287	2.40	11,640	80.02	37.50	51.87	5.91	62.50	14.07	--
Madison CSA 2024	115	34,808	17.27	23,055	83.69	20.87	55.45	4.88	70.43	11.43	8.70
Milwaukee-Racine-Waukesha CSA 2024	516	183,273	77.48	55,101	83.94	25.97	54.20	5.39	69.38	10.67	4.65
Wisconsin Non-MSA 2024	19	6,555	2.85	6,604	83.26	36.84	61.02	5.17	52.63	11.58	10.53
Total	666	227,923	100.00	96,400	83.35	25.68	54.69	5.30	68.92	11.35	5.41

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%